safety-kleen®

FEDERAL EXPRESS

November 13, 1990
JJ 90-134

Mr. Dave Englert
New Mexico Environmental Improvement Division
1190 St. Francis Drive
Santa Fe, NM 87503

Subject: Albuquerque Part B Permit Application

Dear Mr. Englert:

This letter is in response to our meeting in Santa Fe, New Mexico on October 12, 1990. Please find enclosed a revised text, responses to comments, revised exhibits, and this information supplied on a formatted disk.

If you have any questions or require further information, please feel free to call me on extension 2227.

Sincerely,

Jennifer M. Jendras
Environmental Permit Writer

JMJ/bb

cc: W. Johnson
Br. Mgr. (7-008-01)
B. Wachsmuth

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SAFETY-KLEEN CORP.
Albuquerque, NEW MEXICO SERVICE CENTER
RESPONSES TO COMMENTS FROM OCTOBER 12, 1990 MEETING

Attachment I, Waste Analysis Plan

CFR 264.13(b)

The owner or operator must develop and follow a written waste analysis plan which describes the procedures which he will carry out to provide a detailed chemical and physical analysis of a representative sample of the waste he will store, at a minimum this plan will include:

(a) Parameters and rationale for choosing those parameters,
(b) The test methods used to test for those parameters
(c) Sampling methods for obtaining representative samples.
(d) Frequency of the tests to ensure the analysis is accurate and up to date.
(e) Waste analysis that hazardous waste generators have agreed to supply, or analysis from other sources.
(f) Waste analysis to provide enough knowledge of waste to prevent accidental ignition or reaction of ignitable or reactive waste.

Safety-Kleen's Plan

Comment:

Section 2.0, including pages 19 through 28, describes Safety-Kleen's waste handling procedures and waste analysis plans. Due to the large numbers of small quantity customers individual analysis are impractical, although knowledge of customer processes and protection of the recycling processes are described as essential. The closed loop system concept, the various waste types, and their sources that will be stored at the facility were described. To provide an adequate waste analysis plan we would like to see descriptions of the inspections by sales reps, analyses by the recycling center of each load, and an extensive yearly characterization included in the attachment.

Safety-Kleen is in process of running TCLP characterization on all waste streams. This will help me make a decision on the adequacy of their plan. Will they also characterize the paint waste stream in the same manner? Will the yearly characterization be as in depth as the TCLP characterization described? Will the QA methods and sampling methods be the same? Safety-Kleen described regular analysis at the recycling center and additional sampling by private labs. Provide these details in the plan. The initial characterization should be in the permit as an appendix to their plan and it should be noted that all other analysis will be provided to the service center and recorded. Are those analysis

provided by Denton taken from bulk shipments, specifically from the Albuquerque service center, or are other shipments comingled? Analysis are required when processes change, and considering that most of Safety-Kleen customers are small quantity generators, detailed instructions and/or training should be considered, providing users knowledge or notification requirements, health and environment hazards, and spill prevention and clean-up procedures.

Response:

A revised waste analysis plan has been enclosed in Chapter 2.

Attachment II, Security Plan

The description of A-K security measures are described on pages 27 and 28 of the Part B permit application. CFR 264.14 requires that a demonstration be made that unauthorized or unknowing persons or livestock entering the facility will not be harmed by contact with waste, structures, or equipment. Nor will a disturbance of waste or equipment by unauthorized/unknowing persons will not cause any violation of Part 264.

Comment:

Safety-Kleen has provided a short but adequate description of security measures taken at the Albuquerque service center except for some minor details that may easily be corrected. The six foot high fence described topped by barbed wire is somewhat different than what is at the facility. Most of the fencing system is topped by some kind of coiled razor wire than barb wire. Mr. Rockwell has also described a major extension of the fence around the facility with remote sensing devices to provide entrance to the facility. When will this be installed? Warning signs are provided and include Spanish. There is a significant Hispanic population in Albuquerque and the warning would be required, but it should also be indicated to be so in the Part B application.

Response:

The fence at the facility is topped by 3 layers of razor wire. Section 3.1 has been revised to reflect this.

The fence extension that will surround the new warehouse which will include a gate with remote sensing devices is estimated to be installed by January 15, 1990.

The warning signs in Spanish have been included in section 3.1.

Comment:

The solvent dispensing equipment inspection description may be sufficient but the description of the pumping equipment and handling management should be described in more detail.

Response:

The pumping equipment used to dispense the solvent into barrels can be set to fill either 9- or 18-gallons for the respective 16- or 30-gallon drums and will automatically stop dispensing when the barrel is filled to the set amount. The pumping equipment has an automatic shut off timer that will turn the equipment completely off after it has been on for a period of 30 minutes. The pump must be turned on again if it is to be continually used over this 30 minute period. There are manual emergency shut off valves on each hose which can stop them from dispensing should there be a problem. Safety-Kleen personnel filling the barrels will wear safety glasses, gloves, and a protective apron at all times and they will be trained in the proper handling and use of this equipment.

Comment:

Itemized descriptions and reasoning for what would be required for 'adequate' content of the safety equipment would be helpful. Place on inspection sheets?

Response:

An adequate amount of stored safety supplies is an amount that can reasonable contain and/or clean up a spill which can be completely remediated using the procedures in 4.3.1. The amount of safety equipment stored will contain enough personal protective gear to suit all personnel involved in clean up. The content of the safety equipment has been added to the emergency equipment list in Appendix E and in section 2.3.1.

Attachment III, Inspection Schedule

Comment:

Safety-Kleen has described inspection procedures and scheduling on pages 29 to 31 in the Part B permit application. The CFR 264.15 requires that inspections are provided often and thorough enough to prevent any release of hazardous waste to the environment or threat to human health.

Response:

A detailed inspection sheet has been enclosed in Appendix E.

Comment:

Safety-Kleen has described the various units and frequencies that those units will be inspected. The descriptions are somewhat vague, and could be updated. The inspection sheets do itemize in some detail what is to be inspected and for what, but a detailed description of the various units would be of great help.

Response:

All units listed in section 3.2 have their inspection frequencies listed.

Comment:

The tank system has a leak detection system that should be regularly inspected. This includes checking the alarm system daily, and some method of checking the fluid sensing device within the double walls of the tank, to ensure that it remains functioning. Volume of wastes soundings should be described. The audio-visual alarm system for high level alarm system in the tank is regularly checked, but describe how the fluid sensing device is checked to ensure it is still operational.

Response:

A continuous monitor is used for leak detection with the Albuquerque tanks. Piping is retrofitted to allow daily inspection of leakage. The leak detection for the tank will be designed to promptly detect any release from the primary tank into the secondary containment. An automated leak detection system using a liquid detection probe in conjunction with a remote alarm system is to be the primary leak detection method. This audiovisual high alarm is tested by pressing a button to verify that the strobe light and alarm are operational. This alarm will also sound when the tank is approximately 600 gallons from being full. An access pipe is also designed for use with a dipstick for manual detection of liquids. Sudden deviations in solvent volumes will be investigated and their causes determined. If necessary, repairs must be initiated immediately. The tanks are visually inspected daily for cracks or leaks.

Attachment IV, Training

CFR 264.16 requires training that enables employees to do their jobs in a way that ensures they are able to respond effectively to an emergency. Training should include use and care of emergency and monitoring equipment, waste feed cut-off, communications and alarm systems, response to fires or explosions, response to groundwater contamination, and shutdown of operations.

Safety-Kleen's Plan

Comment:

Section 5.0, including pages 62 through 68, and Appendix G, describes Safety-Kleen's personnel training program. Within Appendix G references are made about the Contingency Plan and the Preparedness and Prevention Plan. These documents cover training requirements to a degree, although a few things could be tightened up. Automated waste feed cut-off systems at the return and fill staging areas and whatever equipment for bulk transfer used at the underground storage tanks should be more fully described, including equipment description, training for use, and inspection of devices. Communications and alarm systems are described as an internal alarm system (verbal warning?), with the increasing distance to the ignitable storage unit an additional warning system or operational system should probably be considered. During fires or after explosions, a clarification of responsibility for cutting power to the units is needed. After a major spill power switches are to remain in the original position at the time of the spill, and at other descriptions responsibility to shut down the power is mentioned. If that refers to the electrical panel box, describe the location of the electrical panel box, describe the location of the electrical panel box and make clear in the Part B application. The permit application refers to spill simulation and spill reports in Appendix G. Would you describe what is involved in that training, what equipment is used? How are people trained to respond to fire or explosion, and how and what equipment are they trained to use.

Response:

The safety procedures used for the loading and the unloading of the tanker trucks which transfer the mineral spirits solvent to and from the underground tank has been enclosed in Appendix E.

The internal alarm system at this facility is a buzzer sound and an alarm system will also be installed at the ignitable storage facility.

An electric panel box is located inside the warehouse. The emergency coordinator is responsible for cutting power in situations he feels this response is necessary. The electrical system has fuse links which will automatically cut off power to the facility at the ground level if an explosion or fire occurs as they are heat sensitized.

Spill simulation and training situations are set up by the branch manager who oversees the training of his employees. The branch manager will devise certain hazardous spill situations that need to be cleaned or contained and he instructs and observes his employees remediating the situation. Employees are trained to respond to fires and explosions by various fire drill activities. The branch manager can make up certain circumstances that may accompany a fire and/or explosion which his employees should be prepared to respond to. Safety-Kleen personnel are trained to use fire extinguishers to put out a fire before it spreads. If this situation is not possible, they are trained to alert other employees by alarm systems and/or verbal communication and evacuate the facility immediately then proceed to call the fire and police departments.

Attachment 5, Procedures for Handling Ignitable, Reactive, and Incompatible Wastes

CFR 264.17 requires that precautions must be taken to prevent the accidental ignition or reaction of wastes including precautions that would prevent generation or create risk of heat, fire, explosion, or violent reaction, air emissions that could threaten human health or the environment, damage of structural integrity of the facility, or threats to human health or the environment in any other way. Compliance of these requirements must be documented.

Safety-Kleen's Plan

Comment:

Section 3.4, pages 36 through 40, describes Safety-Kleen plant operations and the potential spill and fire sources and control procedures. Safety-Kleen states that wastes stored on site are compatible, and in fact mineral spirits is sometimes used as a corrosion prohibitor. Other than mineral spirit wastes are stored and documentation is still required to show that Safety-Kleen complies with 264.17. The ignitable wastes stored in the paint waste unit is subject to a non-air conditioned building and temperatures could reach fairly high levels. The structure has been described as being built to local and national fire codes, describe what codes those are and the relation to the above requirements. At some point a decision must be made as to

the scheduling of installation of the various proposed units and as-built, certified plans will be required upon completion.

Response:

The compatibility of wastes has been included in Chapter 3.

Information on the ignitable storage shelter has been requested and will be forwarded to you upon receipt as we are upgrading the shelter to be built.

Comment:

Safety-Kleen states that if leak detected the tank will be taken out of service repaired and reused, Safety-Kleen was also to be making yearly tank assessments and we have only received one since 1988, Safety-Kleen has also indicated for some time that the tank was to be replaced in the very near future, (see administrative records and personal communications).

Response:

Our yearly 1989 tank test was not performed until 4-17-90 as we were in the process of both changing the company and the method in which our tanks are leak tested. Results of this leak test have been enclosed in Appendix D. Our 1990 annual leak test is scheduled for November 25, 1990. Results of this test will also be forwarded upon receipt.

The Safety-Kleen facility at Albuquerque appears to be a well run operation, although we have a few problems with the permit application.

Some problems appear to be created from new operating practices and units that are proposed to be added.

Comment:

There have been some operational changes that should probably be considered. The return and fill station has been changed to include a device that rinses the barrels after they have been emptied. An additional waste is therefore eliminated and sounds like a good idea. But again we have little information about it.

Response:

The barrel washer is a device located within the wet dumpster, but does not replace the dumpster itself. The dumpster/barrel washer is tight piped to the solvent mineral spirits tank. A barrel emptied upside down within the dumpster. The spent mineral spirits is piped in and rinses the inside of the barrel and is then piped back to the spent mineral spirits tank. Two diagrams of this barrel washer have been included in Appendix C.

Mr. Rockwell has suggested that the facility has scheduled additional changes in the future. One of these changes include an additional fence and entrance system. Are these plans finalized and would you not like to include it in the permit, permit mods would be required at a later date.

A six foot fence topped with 3 layers of razor wire will surround the entire facility. An automatic electronic gate will be located at the entrance of the facility to allow entrance and exit to company vehicles and remain locked the rest of the time. This information has been enclosed in section 3.1.

Comment:

(a) Underground storage tank must be installed or at least scheduled to be installed within a short time frame, options include delaying the installation but permit modifications will become very time consuming and expensive. Note: certified, as-built plans, and installation documentation will be required.

Response:

Underground storage tanks are scheduled to be installed in early 1991. A tank design assessment letter, site plan, and approval letter from the New Mexico Hazardous Waste program concerning these new tanks have been requested and will be forwarded to you upon receipt. Mark Kaufman of the New Mexico Environmental Improvement Division already has this documentation.

Comment:

(b) The piping plans are not sufficient and are important to be able to understand operation practices, inspection and secondary containment requirements Safety-Kleen will follow.

Response:

The piping plans are included in the tank design assessment letter that Mark Kaufman of EID has, and will be forwarded to you upon receipt.

Comment:

(c) We understand that the ignitable storage building is to be installed as soon as discrepancies are cleared up with the city of Albuquerque. We would still like to see more information about the building, and how it in fact complies with other local, and federal safety codes. Scheduling and submittal of certified, as-built plans will be required.

Response:

As stated previously, information concerning the flammable storage shelter has been requested and will be forwarded to you upon receipt.

Comment:

The closure of the single lined tank will need to be addressed as a separate item, and would have to be closed within a specific time frame after installation of the new tank system. A community water supplyweel is relatively near and the closure plan is not adequate.

Response:

A closure plan has been requested from our remedial environmental engineer. It will be forwarded to you upon receipt.

Comment:

(b) Response and notification requirements need to be discussed. At what time does Safety-Kleen consider spills to be major and obligated to report to director?

Response:

Spills are considered to be major when they cannot be completely remediated using the methods described in 'a' and 'b' of section 4.3.1.

Comment:

(a) Pollution Incident History should be changed to include clean-up of minor spills (see administrative record).

Response:

The Pollution Incident History has been deleted from the Part B permit application, but a report has been requested and forwarded to upon receipt. Minor spills will continue to be remediated following the procedures in 4.3.1.

STORAGE FACILITY

PERMIT APPLICATION

SAFETY-KLEEN CORP. SERVICE CENTER

ALBUQUERQUE, NEW MEXICO

NMD 000804294

Prepared by: SAFETY-KLEEN CORP.

September 16, 1987

Revised: May 4, 1990

Revised: September 25, 1990

Revised: November 9, 1990

CERTIFICATION STATEMENT

Albuquerque, New Mexico Service Center

NMD 000804294

The undersigned, being a vice president of Safety-Kleen Corp., the permit applicant, certifies under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

David A. Dattilo
Vice President, Sales and Service

9/25/90
Date

Scott E. Fore
Vice President, Environment, Health and Safety

9/26/90
Date

90-432

ATTESTATION

The undersigned, attesting witness to the Certification Statement and this document dated September 25, 1990, of which this affidavit is a part, states that I am personally responsible for the preparation of the document, that I personally gathered the information contained herein, and further that the information, to the best of my knowledge and belief, is true, accurate and complete.

Ellen J. Iurczak
Environmental Permits Manager

9-26-90
Date

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FACILITY DESCRIPTION

ABSTRACT

CORPORATE HEADQUARTERS:	Safety-Kleen Corp. 777 Big Timber Road Elgin, IL 60123 708/697-8460
RESPONSIBLE OFFICIALS:	David A. Dattilo Vice President, Sales and Service Scott E. Fore Vice President, Environment, Health and Safety
FACILITY ADDRESS:	Safety-Kleen Corp. (7-008-01) 2720 Girard NE Albuquerque, NM 87107
TELEPHONE NUMBER:	505/884-2277
U.S. EPA I.D. NUMBER:	NMD 000804294
GEOGRAPHIC LOCATION:	35° 06′ 44″ N 106° 36′ 46″ W
OWNER:	Safety-Kleen Corp.
DATE OPERATIONS BEGAN:	March 1, 1977

DESCRIPTION OF ACTIVITIES: This facility is an accumulation point for spent solvents generated by Safety-Kleen customers, the majority of whom are small quantity generators. All wastes are ultimately shipped to a Safety-Kleen recycling facility or a contract reclaimer and then returned to the Company's customers as product.

PROPERTY DESCRIPTION: About 1.05 acres with the following structures:

a. one building with offices and a warehouse with two areas for container storage;

b. two underground double-walled storage tanks (one for product and one for spent solvent);

c. one loading dock with a solvent return and fill station; and

d. one enclosed shelter to be used for container storage.

FACILITY TYPE: Storage in an aboveground tank (S02) and in containers (S01)

STORAGE UNIT	CAPACITY (GAL.)	SECONDARY CONTAINMENT(GAL.)	MATERIAL TO BE STORED
Tank	12,000	*	Spent Mineral Spirits Solvent (D001[1])
Container Storage--east Warehouse	2,592	448.4	Spent Immersion Cleaner (F002, F004)[1] Dry Cleaning Waste (F002)[1]
Container Storage-- West Warehouse	3,456	549.8	Spent Immersion Cleaner (F002, F004)[1] Dry Cleaning Waste (F002)[1]
Container Storage-- Metal Shelter	1,092	1,122	Paint Waste (D001,F003,. F005)[1] Dumpster Sediment (D001)[1]

* indicates double-walled tank

1 D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042 and D043

1.0 FACILITY DESCRIPTION

1.1 DESCRIPTION OF BUSINESS ACTIVITY

Safety-Kleen Corp. is an international service-oriented company whose customers are primarily engaged in automotive repair, industrial maintenance and dry cleaning. The company has been operating since 1968 offering solvent collection and reclamation services for its 400,000 customers, more than 99% of whom generate less than 1000 kilograms (2200 pounds) per month. In 1989, Safety-Kleen reclaimed more than 40 million gallons of spent solvent.

Currently, Safety-Kleen offers five services, three of which involve the accumulation and storage of spent solvent at 164 service centers in 46 states. These wastes are shipped from the service centers to one of seven Safety-Kleen recycle centers or to an independent reclaimer and are then returned to customers as usable product. A unique feature of this system is that Safety-Kleen retains ownership of the parts cleaning machines and the solvent. This "closed loop" system allows the Company to maintain control of the solvent except while it is in use at the customer's place of business. A description of each of these three services follows.

1.1.1 Parts Cleaner Service

The original service offered by the Company in 1968 was the parts cleaner service and it remains the primary business activity. This service involves the leasing of a small parts degreasing unit which consists of a sink affixed to a 16- or 30-gallon drum containing Safety-Kleen 105 Solvent (mineral spirits). On a regularly scheduled basis, a Safety-Kleen sales representative cleans and inspects the parts washer machine and replaces the drum of used solvent with one of clean product. Each sales representative performs about fifteen of these services per day, collecting the drums of used solvent on a route van.

At the end of each day, the solvent is transferred from the drums to a storage tank at the service center and drums of product are prepared for the next day's services. Periodically, a tanker truck is dispatched from one of the recycle centers to deliver a load of clean solvent and collect the spent solvent at the service center. Two-thirds of the solvent used by Safety-Kleen customers has been reclaimed with the remainder being purchased from a vendor.

Safety-Kleen has also established a parts cleaner service for users who own their machines. This service, known as the Customer Owned Machine Service, provides a solvent reclamation service to these customers regardless of machine model. The used solvent is pumped (using a hand pump) from the customer owned machine to a standard Safety-Kleen 16- or 30-gallon drum by a Safety-Kleen sales representative. The waste solvent is

stored in the same manner as the waste cleaner solvent collected from our leased parts cleaner machines. The sales representative then refills the customer-owned machine with drummed Safety-Kleen mineral spirits solvent via the hand pump. The same analyses are performed on waste solvent from customer-owned machines as are down-leased parts cleaner machines.

A second type of parts washer, the immersion cleaner, is available for the removal of varnish and gum from such things as carburetors and transmissions. This machine consists of an immersible basket with an agitator affixed to a 16-gallon drum containing a chlorinated solvents/cresylic acid blend. The spent solvent remains in the drum after delivery to the service center where it is stored in a contained area of the warehouse. Periodically, a box trailer truck is dispatched from a recycle center to deliver drums of fresh solvent and collect the drums of spent solvent for reclamation.

1.1.2 Dry Cleaner Service

In 1984, Safety-Kleen began offering a service for the collection of filter cartridges and still bottoms contaminated with dry cleaning solvents (usually perchloroethylene). These wastes are drummed on the customer's premises and are periodically collected by a sales representative. The drummed waste is accumulated in a contained area of the warehouse for shipment to a Safety-Kleen recycle center. About 35% of this waste is returned to dry cleaners as usable product.

In accordance with 40 CFR 264.73, Safety-Kleen maintains a manifest system, an operating log, biennial reports and all other records required under these sections.

The operating record must include: 1) a record of hazardous waste shipments rejected by the facility including the following:

a. the name of the generator and transporter,
b. the manifest number,
c. the date the shipment was rejected, and
d. the reason for rejection;

2) personal training records for all current personnel; and

3) The contents of the waste storage tank, the quantity of each waste received, and the date each period of accumulation begins (i.e., the date each waste solvent pickup occurs) must also be included in the operating record.

A biennial report must be submitted by March 1 of each even numbered year. The biennial report shall be submitted on form 8700-13B. The report shall cover facility activities during the previous calendar year and shall include all of the following information:

(a) The EPA identification number, name, and address of the facility.

(b) The calendar year covered by the report.

(c) For off-site facilities, the EPA identification number of each hazardous waste generator from which the facility received a hazardous waste during the year, and, for imported shipments, the name and address of the foreign generator.

(d) A description and the quantity of each hazardous waste the facility received during the year. For off-site facilities, this information shall be listed by EPA identification number of each generator.

(e) The method of treatment, storage, or disposal for each hazardous waste.

(f) The most recent closure cost estimate under 40 CFR 264.142.

(g) The certification signed by the owner or operator of the facility or the owner or operator's authorized representative.

Safety-Kleen must implement the manifesting system required under 40 CFR 264.71.

If the facility receives hazardous waste accompanied by a manifest, the branch manager or his designate shall do all of the following:

(a) Sign and date each copy of the manifest to certify that the hazardous waste covered by the manifest was received.

(b) Note any significant discrepancies in the manifest on each copy of the manifest.

(c) Within 30 days after the delivery, send a copy of the manifest to the generator.

(d) Retain, at the facility, a copy of each manifest for not less than 3 years from the date of delivery. (Safety-Kleen is the TSDF as well as the transporter so only one copy is kept on file).

(e) Return a copy of the manifest to the director or his or her designee within a period of 10 days after the end of the month in which the waste was received.

The requirements described above do not apply to hazardous waste produced by generators of more than 100 kilograms but less than 1,000 kilograms in a calendar month if both of the following requirements are met:

(a) The waste is reclaimed under a contractual agreement pursuant to which the type and frequency of shipments are specified in the agreement and the vehicle used to transport the waste to the recycling facility and to deliver the regenerated material back to the generator is owned and operated by the reclaimer of the waste.

(b) The generator maintains a copy of the reclamation agreement in his or her files for a period of not less than 3 years after termination or expiration of the agreement.

The facility will not receive bulk shipments of hazardous waste from a rail or water transporter.

When a shipment of hazardous waste in initiated from this facility, the branch manager or his designate must:

(a) Prepare a manifest before transporting the waste off-site.

(b) Designate on the manifest one facility which is licensed to handle the waste described on the manifest. The branch manager may also designate on the manifest on alternate facility which is licensed to handle his or her waste if an emergency prevents delivery of the waste to the primary designated facility.

(c) Use a transporter who is properly licensed under the act or a generator-owned vehicle licensed under the act to transport the waste.

(d) If the transporter is unable to deliver the hazardous waste to the designated facility or the alternate facility, the generator shall either designate another facility or instruct the transporter to return the waste.

Except as described in the next paragraph, the branch manager shall use a manifest form approved by the director which contains all of the following information:

(a) A manifest document number.

(b) The generator's name, mailing address, telephone number, and EPA identification number.

(c) The name and EPA identification number of each transporter.

(d) The name, address, and EPA identification number of the designated facility and an alternate facility, if any.

(e) The description of the waste required by regulations of the DOT in the provisions of 49 CFR 172.101, 172.202, and 172.203.

(f) The total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle.

(g) The hazardous waste number describing the waste.

(h) The following certification: "I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations."

(i) Other certification statements required by the director based on requirements under title II of the solid waste disposal act.

If the branch manager manifests a shipment of hazardous waste out of state, and if the state to which the shipment is manifested requires the use of another manifest, then the generator shall use that manifest.

The branch manager shall do all of the following when initiating a shipment:

(a) Sign the manifest certification by hand.

(b) Obtain the handwritten signature of the initial transporter and the date of acceptance on the manifest.

(c) Retain one copy for his files.

(d) Submit one copy to the director or his or her designee, which shall be postmarked not later than 10 days after the month in which shipment was made.

(e) Give the remaining copies to the transporter.

When Safety-Kleen receives or ships hazardous waste, the branch manager or his designate must review the manifest and check the information on the manifest for correctness. It should be noted that Safety-Kleen computer-prints most of the required information on the majority of its manifests. The employee checking the manifest must review the names, addressed, EPA and New Mexico I.D. and transporter numbers, the manifest document number and the telephone numbers listed. In addition, the hazardous material (HM) box should be checked, the waste description, DOT classification, DOT I.D. number and EPA Waste Code must be verified. The number of drums and pounds, as well as the symbols for these units must be correct and an "H" must be entered in the last column. The generator, transporter(s) and TSDF operator must all print and sign their names and enter the date the waste was shipped or received, as appropriate.

Upon discovering a significant manifest discrepancy, the branch manager shall attempt to reconcile the discrepancy with the waste generator or transporter through telephone conversations or otherwise. If the discrepancy is not resolved within 15 days after receiving the waste, the branch manager shall immediately submit, to the director and regional administrator, a letter describing the discrepancy and attempts to reconcile it and a copy of the manifest or shipping paper at issue. Significant manifest discrepancies are differences between the quantity or type of hazardous waste a facility actually receives, as follows:

(a) For bulk waste, significant discrepancies are variations of more than 10% in weight.

(b) For batch waste, a significant discrepancy is any variation in piece count, such as a discrepancy of one drum in a truckload.

(c) Significant discrepancies in type are obvious differences which can be discovered by inspection or waste analysis, such as waste solvent substituted for waste acid or toxic constituents not reported on the manifest or shipping paper.

1.1.3 Paint Waste Collection Service

In 1986, a paint waste reclamation program was initiated to service automobile body repair businesses. Wastes containing various thinners and paints are collected in 5-gallon pails and 16-gallon drums on the customer's premises. The sales representative collects these containers and stores them in an enclosed metal shelter which is separate from the office/warehouse. These wastes are periodically shipped to a reclaimer and the regenerated solvent is distributed to Safety-Kleen customers for use as product.

In accordance with 40 CFR 264.73, Safety-Kleen maintains a manifest system, an operating log, biennial reports and all other records required under these sections.

The operating record must include: 1) a record of hazardous waste shipments rejected by the facility including the following:

a. the name of the generator and transporter,
b. the manifest number,
c. the date the shipment was rejected, and
d. the reason for rejection;

2) personal training records for all current personnel; and

3) The contents of the waste storage tank, the quantity of each waste received, and the date each period of accumulation begins (i.e., the date each waste solvent pickup occurs) must also be included in the operating record.

A biennial report must be submitted by March 1 of each even numbered year. The biennial report shall be submitted on form 8700-13B. The report shall cover facility activities during the previous calendar year and shall include all of the following information:

(a) The EPA identification number, name, and address of the facility.

(b) The calendar year covered by the report.

(c) For off-site facilities, the EPA identification number of each hazardous waste generator from which the facility received a hazardous waste during the year, and, for imported shipments, the name and address of the foreign generator.

(d) A description and the quantity of each hazardous waste the facility received during the year. For off-site facilities, this information shall be listed by EPA identification number of each generator.

(e) The method of treatment, storage, or disposal for each hazardous waste.

(f) The most recent closure cost estimate under 40 CFR 264.142.

(g) The certification signed by the owner or operator of the facility or the owner or operator's authorized representative.

Safety-Kleen must implement the manifesting system required under 40 CFR 264.71.

If the facility receives hazardous waste accompanied by a manifest, the branch manager or his designate shall do all of the following:

(a) Sign and date each copy of the manifest to certify that the hazardous waste covered by the manifest was received.

(b) Note any significant discrepancies in the manifest on each copy of the manifest.

(c) Within 30 days after the delivery, send a copy of the manifest to the generator.

(d) Retain, at the facility, a copy of each manifest for not less than 3 years from the date of delivery. (Safety-Kleen is the TSDF as well as the transporter so only one copy is kept on file).

(e) Return a copy of the manifest to the director or his or her designee within a period of 10 days after the end of the month in which the waste was received.

The requirements described above do not apply to hazardous waste produced by generators of more than 100 kilograms but less than 1,000 kilograms in a calendar month if both of the following requirements are met:

(a) The waste is reclaimed under a contractual agreement pursuant to which the type and frequency of shipments are specified in the agreement and the vehicle used to transport the waste to the recycling facility and to deliver the regenerated material back to the generator is owned and operated by the reclaimer of the waste.

(b) The generator maintains a copy of the reclamation agreement in his or her files for a period of not less than 3 years after termination or expiration of the agreement.

The facility will not receive bulk shipments of hazardous waste from a rail or water transporter.

When a shipment of hazardous waste is initiated from this facility, the branch manager or his designate must:

(a) Prepare a manifest before transporting the waste off-site.

(b) Designate on the manifest one facility which is licensed to handle the waste described on the manifest. The branch manager may also designate on the manifest one alternate facility which is licensed to handle his or her waste if an emergency prevents delivery of the waste to the primary designated facility.

(c) Use a transporter who is properly licensed under the act or a generator-owned vehicle licensed under the act to transport the waste.

(d) If the transporter is unable to deliver the hazardous waste to the designated facility or the alternate facility, the generator shall either designate another facility or instruct the transporter to return the waste.

Except as described in the next paragraph, the branch manager shall use a manifest form approved by the director which contains all of the following information:

(a) A manifest document number.

(b) The generator's name, mailing address, telephone number, and EPA identification number.

(c) The name and EPA identification number of each transporter.

(d) The name, address, and EPA identification number of the designated facility and an alternate facility, if any.

(e) The description of the waste required by regulations of the DOT in the provisions of 49 CFR 172.101, 172.202, and 172.203.

(f) The total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle.

(g) The hazardous waste number describing the waste.

(h) The following certification: "I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in

all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations."

(i) Other certification statements required by the director based on requirements under title II of the solid waste disposal act.

If the branch manager manifests a shipment of hazardous waste out of state, and if the state to which the shipment is manifested requires the use of another manifest, then the generator shall use that manifest.

The branch manager shall do all of the following when initiating a shipment:

(a) Sign the manifest certification by hand.

(b) Obtain the handwritten signature of the initial transporter and the date of acceptance on the manifest.

(c) Retain one copy for his files.

(d) Submit one copy to the director or his or her designee, which shall be postmarked not later than 10 days after the month in which shipment was made.

(e) Give the remaining copies to the transporter.

When Safety-Kleen receives or ships hazardous waste, the branch manager or his designate must review the manifest and check the information on the manifest for correctness. It should be noted that Safety-Kleen computer-prints most of the required information on the majority of its manifests. The employee checking the manifest must review the names,

addresses, EPA and New Mexico I.D. and transporter numbers, the manifest document number and the telephone numbers listed. In addition, the hazardous material (HM) box should be checked, the waste description, DOT classification, DOT I.D. number and EPA Waste Code must be verified. The number of drums and pounds, as well as the symbols for these units must be correct and an "H" must be entered in the last column. The generator, transporter(s) and TSDF operator must all print and sign their names and enter the date the waste was shipped or received, as appropriate.

Upon discovering a significant manifest discrepancy, the branch manager shall attempt to reconcile the discrepancy with the waste generator or transporter through telephone conversations or otherwise. If the discrepancy is not resolved within 15 days after receiving the waste, the branch manager shall immediately submit, to the director and regional administrator, a letter describing the discrepancy and attempts to reconcile it and a copy of the manifest or shipping paper at issue. Significant manifest discrepancies are differences between the quantity or type of hazardous waste designated on the manifest or shipping paper and the quantity or type of hazardous waste a facility actually receives, as follows:

(a) For bulk waste, significant discrepancies are variations of more than 10% in weight.

(b) For batch waste, a significant discrepancy is any variation in piece count, such as a discrepancy of one drum in a truckload.

(c) Significant discrepancies in type are obvious differences which can be discovered by inspection or waste analysis, such as waste solvent substituted for waste acid or toxic constituents not reported on the manifest or shipping paper.

1.2 DESCRIPTION OF THE FACILITY

The Albuquerque service center has been operating as a storage facility since March 1, 1977. The facility consists of the following structures:

a. a 2,500 square foot warehouse with offices and contained areas for drum storage;

b. two 12,000 gallon underground double-walled storage tanks (one for product and one for spent solvent);

c. a solvent return and fill station with a loading dock; and

d. an enclosed metal shelter for the storage of containerized ignitable waste.

Descriptions of the surrounding area and of waste management practices at the service center follow. Applicable maps and facility drawings are in Appendix C.

1.2.1 Regional Description

The Albuquerque, New Mexico Service Center is located in Bernalillo County about one mile northwest of Carlisle Blvd. and S.R. 40. This area is zoned for manufacturing and to the best of Safety-Kleen's knowledge, no easements or title, deed or usage restrictions exist which may be in conflict with operations at this site.

Albuquerque is bordered by the 11,000 acre Cibola National Forest to the east and the Canocito Navajo Indian Reservation to the west. The total population of Albuquerque and surrounding areas in Bernalillo, Sandoval and Valencia counties is about 350,000. The climate in this area is an arid, continental climate. Rainfall varies, but in the vicinity of the service center, average annual precipitation is 7 to 10 inches. Average snowfall is about 10 inches. The average temperature in winter is approximately 38°F and 74°F in summer. Winds blow from the north in winter and from the south in summer. The average annual windspeed is 9 miles per hour.

Albuquerque is located in the Rio Grande Valley, and is bordered on both sides by mesas rising about 5,000 feet. The elevation at the service center is approximately 5,100 feet. The service center is not in the 100-year flood plain.

The soil in the vicinity of the service center is the Wink Series. These deep, well drained soils are formed in unconsolidated alluvium but have been modified by colian erosion. The slopes are generally 0 to 1 percent in the area of the service center. The surface layer is a brown, fine sandy loam.

The Albuquerque Service Center receives its water from the City of Albuquerque which also maintains a sanitary sewer line on Girard Avenue. Drainage in this area is by way of a series of diversion channels. The North Diversion Channel is directly east of the service center.

No known oil or gas wells exist within one quarter mile of the site and it is not located in or near a wetland or critical habitat. No schools, parks or hospitals exist within one quarter mile of the facility.

The non-building areas of the facility are paved with asphalt, gravel or concrete as noted on the site plan in Appendix C. The majority of the vehicular traffic and loading/unloading operations occur at and near the return and fill station and this area is paved with asphalt and concrete. The entrance to the facility is on Girard Avenue, which is the major access road to the facility. The access road was designed in accordance with engineering criteria appropriate for sustaining the traffic volume and loading for the manufacturing activities in this area. The route vans that daily travel the routes between the service center and its customers use the two-lane approach driveway.

1.2.2 Waste Management Practices

The Albuquerque service center was designed to facilitate the handling and storage of the wastes resulting from the services offered by Safety-Kleen. The underground storage tanks, drum storage areas, return and fill station, and the ignitable waste shelter all have secondary containment and the service center has the equipment necessary for employees to safely manage wastes on-site. Appendix C contains drawings of the waste management facilities.

Spent mineral spirits from parts washers is accumulated in a 12,000 gallon underground double-walled storage tank via the return and fill station. 16- and 30-gallon drums containing seven and twelve gallons of spent solvent, respectively, are poured into the dumpsters in the return and fill station, and material in the dumpster is pumped into the storage tank for spent solvent. The return and fill station has secondary containment in the form of a 16′6″ x 8′9″ x 0.5′ (540 gallons) metal pan at its base.

The underground double-walled tanks have been designed in accordance with NFPA standards and are constructed of carbon steel. Two tanks holding 12,000 gallons each are installed underground; one is for clean and one is for spent mineral spirits. Each tank is equipped with an audiovisual high level alarm.

The container storage areas in the warehouse are used only for the storage of (1) spent immersion cleaner and (2) dry cleaning wastes. The wastes are not mixed while on site and different wastes are segregated in color-coded drums to indicate their contents: immersion cleaner in gray 16-gallon drums, and dry cleaning waste in blue steel 20- and 30-gallon drums and 16-gallon black polyethylene drums with blue lock rings. While the wastes are not incompatible with one another, it is necessary to segregate them for inventory and quality control purposes.

The drum storage area in the east side of the warehouse has secondary containment in the form of a six inch wide by four inch high steel reinforced concrete curb with a 12′ x 2′ x 2.5′ (448.8 gallons) collection trench. No more than 2,592 gallons of spent solvents will be stored in this drum storage area at any time.

The drum storage in the west side of the warehouse has secondary containment in the form of a six inch wide by four inch high steel reinforced concrete slab with a 12′L x 1′9″W x 3′6″D (549.8 gallons) collection trench. No more than 3,456 gallons of spent solvent will be stored in this drum storage area at any given time.

Paint wastes will be placed in black 5-gallon metal pails and in black 16-gallon drums at the customer′s place of business and sediment from cleaning the dumpsters is placed in red 16-gallon drums. These containers of ignitable wastes are palletized and stored in the enclosed metal shelter

shown in Appendix C. This structure has secondary containment in the form of a 20′ x 15′ x 0.5′ (1,122 gallons) metal pan at its base; no more than 1,092 gallons will be stored at any given time.

The containers will be stored in the configurations shown on the Floor Plans in Appendix C. Two feet of aisle space will be maintained and the drums will be stored no more than two high. Containers in the drum storage areas will be placed on pallets and moved with a forklift or pallet jack.

WASTE ANALYSIS PLAN

ABSTRACT

Waste Description	EPA Waste Code Nos.	Facility Capacity[1]	Annual Amount[2]
Spent Mineral Spirits	D001[5]	12,000	103
Bottom Sediment From the Tank	D001[5]	N/A	2
Spent Immersion Cleaner	F002, F004[5]	6,048[3]	2.5
Dry Cleaning Waste	F002[5]		12
Paint Waste	D001, F003, F005[5]	1,092[4]	14.3
Dumpster Sediment	D001[5]		2

1 The facility capacity is in gallons.
2 The annual amount is in thousands of gallons.
3 The total amount of drummed waste stored in the east side of the warehouse will not exceed 2,592 gallons and the total amount of drummed waste stored in the west side of the warehouse will not exceed 3,456 gallons (a total of 6,048 gallons).
4 The total amount of ignitable wastes stored in the metal shelter will not exceed 1,092 gallons.
5 and D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042 and D043

2.0 WASTE ANALYSIS PLAN

2.1 DESCRIPTION OF WASTES

Six types of waste result from the servicing of Safety-Kleen customers and the maintenance of the service center. It should be noted that the solvents managed at this facility are only incompatible with strong oxidizers and rective metals, none of which are present in the tanks, container storage areas, or the concrete sealant. The solvents are also compatible with one another. Analytical data for the wastes and specifications for the products are in Appendix D and qualitative descriptions follow.

2.1.1 Wastes Resulting From the Parts Washer Service

Spent mineral spirits from parts washers is accumulated in a 12,000 gallon underground double-walled storage tank via the return and fill station. 16- and 30-gallon drums containing seven and twelve gallons of solvent, respectively, are poured into a dumpster at the return and fill station which in turn empties into the tank. This waste handling method results in three types of mineral spirits waste:

a. Spent mineral spirits solvent--The spent mineral spirits solvent is removed from the tank by a tanker truck on a scheduled basis. About 6,000-7,000 gallons are removed every two weeks. This waste is ignitable (D001) and TCLP toxic using

the characteristic leaching procedures. (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043.) In 1986, the Albuquerque service center shipped 85,000 gallons of spent solvent to the Safety-Kleen recycle center in Denton, Texas.

b. Bottom sediment in the tank--Approximately once every two years, it is necessary to remove sediment and other heavy material from the bottom of the tank. A Safety-Kleen vacuum truck is used for this purpose and can collect up to 4,000 gallons of this waste for reclamation. The sediment is ignitable (D001) and TCLP toxic using the characteristic leaching procedures. (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043.)

c. Dumpster sediment--Sediment also accumulates in the bottom of the dumpsters in the return and fill station. This sediment is removed manually with a shovel, drummed and the drums are stacked two-high in the metal shelter. About ten gallons is stored in each 16-gallon drum and the drum is color-coded (red) to indicate its contents. The chemical composition of this

waste is analogous to that of the bottom sediment from the tank. In 1986, about 1,500 gallons of this waste were shipped to Safety-Kleen's Denton, Texas recycle center for reclamation.

Immersion cleaner remains in the drum in which it was originally used until it is received at the recycle center. Drums containing about four and one-half gallons of spent solvents are stacked two-high in the drum storage area of the warehouse. The old formula immersion cleaner contains chlorinated solvents (F002) and cresylic acid (F004). The new immersion cleaner formula is toxic using the characteristic leaching procedure D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043. The drums are color-coded gray. In 1986, about 2,000 gallons of these solvents were shipped to the Denton, Texas recycle center for reclamation.

2.1.2 Wastes Resulting From the Dry Cleaner Service

Dry cleaning wastes consist of spent filter cartridges, powder residue from diatomaceous or other powder filter systems and still bottoms. These wastes are packaged on the customer's premises in black 16- and blue 30- and 20-gallon drums with blue lock rings. The drums are then palletized, stacked two-high and placed in the drum storage area of the warehouse. While approximately 80% of the dry cleaning solvent used is perchloroethylene (F002), and characteristic leaching procedure D004, D005,

D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038,. D039, D040, D041, D042, and D043, about 17% is mineral spirits, (D001) and the remaining 3% is trichloro-trifluoroethane (F002). In 1986, about 5,000 gallons of dry cleaning wastes were shipped to the Safety-Kleen recycle center in Denton, Texas.

2.1.3 Paint Wastes

Paint wastes consist of various lacquer thinners (D001, F003, and F005) and is toxic using the characteristic leaching procedure D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042 and D043. The waste is collected in black 5-gallon pails and in 16-gallon drums at the customer's place of business and the containers are then palletized and stored in an enclosed metal shelter. It is anticipated that this facility will ship 14,300 gallons of paint waste to a reclaimer annually.

2.2 QUALITY CONTROL PROCEDURES

The used solvents are the primary feedstocks for the generation of Safety-Kleen solvent products. As a result, quality control of the spent solvents is necessary to ensure that reclamation occurs in the safest and most efficient manner possible. The service center collects spent solvents from about 1,100 customers, most of whom are small quantity generators, and

fourteen thousand drums containing recoverable solvents are returned to the service center each year for shipment to a reclaimer. With such large numbers of waste generators and waste shipments, performing detailed analyses at the service center is economically and logistically infeasible.

Furthermore, as discussed earlier in the Facility Description, all the materials collected at the service center are managed at all times in the closed loop system and are usually collected from a company with a single process. The composition and quality of these materials are known and Safety-Kleen's operating experiences have shown that the collected materials rarely deviate from company specifications. As an additional safeguard, Safety-Kleen personnel are instructed to inspect all materials before returning them to the service centers. This mode of operation has been proven to safeguard the recycling process and maintain a quality product.

In accordance with New Mexico Hazardous Waste Management Regulations 206.B.3, however, Safety-Kleen will perform physical and chemical analysis of a waste stream when it is notified or has reason to believe that the process or operation generating the waste has changed, or when the result of inspection indicates that the waste collected does not match that designated. The customer's Standard Industrial Classification (SIC) code is listed on the placement contract when he starts Safety-Kleen's service and his use for the machine is determined by the sales representative to be appropriate at that time. Should the sales representative notice the machine is being used for a new purpose or the customer's business changes,

he must review this change with the customer and determine whether the new use is appropriate. It is Safety-Kleen's practice that suspected non-conforming material must not be accepted until a full analysis has been done or the material must be rejected. Procedures to verify waste characteristics occur at several check points in the management of the solvent, as described below.

Safety-Kleen controls the use and management of its solvents by:

1. limiting the solvents stored to those compatible with one another and their containers.

2. limiting the uses of each type of solvent (for example, dry cleaning waste is <u>only</u> collected from dry cleaner shops);

3. determining the customer's type of business (i.e., his SIC code is recorded) and the purpose for which he will use the machine.

4. training customers to use the machines properly;

5. training employees to inspect spent solvent and determine whether it is acceptable;

6. indicating on the service document, <u>every</u> time waste is collected, whether the spent solvent meets Safety-Kleen's acceptance criteria (Item 14 in Appendix D);

7. marking each container with the customer's name, address and EPA I.D. number (if required). This information remains on containerized waste until it is accepted at the reclamation facility; and

8. keeping a record of each incoming and outgoing shipment in the operating log at each facility.

9. Waste shipments to the Denton Recycle facility from the Albequerque, New Mexico branch are not mixed with waste shipments from other branches.

Safety-Kleen's customers sign a service document containing the following information:

a. the name, address and EPA I.D. number of the facility to which the waste is being shipped;

b. the customer's name, address and EPA I.D. number (if required); and

c. the description and amount of Safety-Kleen solvent waste generated.

In addition, each incoming and outgoing shipment is recorded in the facility's operating log.

If a waste is rejected at the time of service, the customer will be given a choice as to whether he will dispose of the waste himself or require Safety-Kleen's assistance. If he requests Safety-Kleen's assistance, a sample will be drawn using a Coliwasa tube and it will be analyzed for flash point and volatile organic compounds. If this analysis does not adequately define the constituents, additional analyses will be performed as necessary (e.g., for semi-volatile organic compounds, base-neutral compounds, PCBs, etc.). If the waste is acceptable at the branch, it will be relabeled and manifested appropriately and then managed with the other wastes. If it is not acceptable, it will either be: (a) managed on a 10 day transfer basis and manifested to a properly permitted reclamation or disposal facility, or (b) manifested and shipped directly to a properly permitted reclamation or disposal facility.

The recycle center located in Denton, Texas sends waste analyses to the service centers. If any sample of the waste solvent does not meet standard acceptance criteria, the recycle center will phone the branch manager and alert him to the situation before any processing is done. The branch manager has the right to refuse any further service to a business which has returned waste unable to meet acceptable criteria. If the particular acceptance criteria is not met, a determination will be made as to what processing technology is required. The material is processed accordingly which may include transportation to another facility. Each truckload of spent mineral spirits comes from one identifiable Safety-Kleen facility. The recycle center and the branch facility have accurate up-to-date information on the waste constituents which are available in the event of a release.

2.2.1 Qualitative Waste Analysis

a. General Inspection Procedures

Safety-Kleen visually inspects each drum of waste when it is collected at the customer's location. Safety-Kleen examines the waste for volume, appearance, consistency and odor and is intimately familiar with the characteristics of the waste it receives. Based on the known waste characteristics, Safety-Kleen has established the specific acceptance criteria set forth below, to be used by Safety-Kleen personnel in their visual inspections. These acceptance criteria allow Safety-Kleen to ensure that the waste being picked up is not contaminated.

If a particular drum of waste does not meet the acceptance criteria, the Safety-Kleen service representative will either (1) sample the waste for testing at a Safety-Kleen laboratory, as described below, to determine whether the waste has been contaminated; or (2) reject the drum of waste. In the event the waste is not sampled, Safety-Kleen will notify the generator's State Agency that is authorized to implement the RCRA hazardous waste management program (or EPA if the RCRA program has not been delegated to the State).

If the waste is sampled for further analysis, the service representative will take a sample of the waste and then seal the drum and label it as hazardous waste. The drum is left with the customer pending the results of the laboratory tests. The laboratory testing involves analyzing the suspect waste for flash-point and the presence of volatile organic compounds using a modified EPA 8010 method (GC analysis). The costs of any sampling and testing performed as a result of the waste failing to meet the acceptance criteria, will be borne by the customer.

If the laboratory analysis reveals that the sampled waste is not contaminated, Safety-Kleen will accept the waste from the customer.

If the laboratory confirms that the waste is contaminated, the generator will be responsible for securing an alternate means of disposal. In the event the generator does not contract with Safety-Kleen to arrange for the treatment or disposal of waste which is sampled and found to be

contaminated, Safety-Kleen will provide the generator's State Agency that is authorized to implement the RCRA hazardous waste management program (or EPA if the RCRA program has not been delegated to the State) with the results of this additional quantitative testing.

b. Waste Specific Criteria

The following is a description of the specific acceptance criteria for each waste stream.

I. Spent Mineral Spirits Solvent

The acceptance criteria for determining by visual inspection whether spent mineral spirits solvent has been contaminated are volume, odor and color, the most significant of which is volume. Spent mineral spirits solvent is collected in 30 and 16 gallon drums which, if no additional material has been added to the waste, should not hold more than 19 and 10 gallons respectively. If the volume of waste in a given drum exceeds the specified level, the Safety-Kleen service representative will sample the waste for laboratory testing as described above, or will reject the waste.

In addition to the volume criterion, the odor of the spent solvent will clearly indicate whether the waste has been contaminated. Spent mineral spirits solvent has a very distinctive odor. The service representatives

are expressly instructed not to deliberately sniff the waste. However, if the mineral spirits solvent has been contaminated the service representative would immediately notice a difference in the odor when he services the machine.

The spent mineral spirits solvent is also visually inspected for its color. Unused mineral spirits solvent has a greenish tint. As the solvent is used, it turns brown in color. The more it is used, the darker brown it becomes, until it is almost black. Therefore, if the spent solvent does not appear to be green, brown, or black, the service representative will sample the waste for possible contamination as described above, or will reject the waste.

II. Immersion Cleaner

Safety-Kleen is currently in the process of reformulating its immersion cleaner. Safety-Kleen is currently in the process of reformulating its immersion cleaner. Safety-Kleen believes that the new immersion cleaner will not be a hazardous waste under the current hazardous waste regulations.

A. Existing Immersion Cleaner

The criteria for the inspection of spent immersion cleaner are volume, color and physical state. There should be no more than 6 gallons of waste, a sample will be tested for contamination following the procedures described above or the waste will be rejected.

Unused immersion cleaner is amber in color. As the solvent is used, it turns brown in color. The more it is used, the darker brown it becomes, until it is almost black. Therefore, if the spent immersion cleaner does not appear to be amber, brown or black, the service representative will either sample the waste for possible contamination as described above, or reject the drum of waste.

The drum of spent immersion cleaner should contain two phases, an aqueous phase and a solvent phase. The aqueous phase should compose approximately 20% of the total volume of waste. If the waste is not separated into phases, or if the aqueous phase is greater than 20%, the service representative will either sample the waste for possible contamination as described above, or will reject the waste.

B. New Immersion Cleaner

In the event the new immersion cleaner is determined to be a hazardous waste, the acceptance criteria and respective descriptions will be the same as those for the existing immersion cleaner, with the exception of the physical state criterion. The new immersion cleaner waste will not have phases, therefore, this criterion is not applicable.

c. Dry Cleaner Wastes

Dry cleaner wastes consist of spent filter cartridges, powder residue and still bottoms.

1. Spent Filter Cartridges

Spent Filter cartridges are placed in either a 15 gallon ("split 30") drum which holds 3 cartridges or a 16 gallon drum which holds either 1 jumbo filter cartridge or 2 smaller filter cartridges. It is obvious to the service representative whether the items in the drums are filter cartridges.

The drums may also contain approximately one inch of liquid which should either be clear or have a light brownish tine. If the amount of the liquid is greater than approximately one inch or if the liquid is a color other than light brown, the service representative will sample the waste for contamination in accordance with the procedures described above, or will reject the waste.

II. Powder Residue

The criteria for the acceptance of powder residue are consistency and color, the former being the more significant criterion of the two. A drum of powder residue should not contain any liquid. As the name implies, it will be dry or "powdery" to the touch. if there is any

liquid in the drum, the waste will be sampled for contamination in accordance with the procedures described above, or the waste will be rejected.

The powder residue is also inspected for color and should appear to be grayish-black. If the residue is not grayish-black in color, the service representative will sample the waste for contamination in accordance with the procedures described above, or will reject the waste.

III. Still Bottoms

The criteria for the acceptance of dry cleaning still bottoms are consistency and color. The waste should have a highly viscous, tar-like consistency. If the consistency of the waste is too thin or if there is more than one inch of free liquid in the drum, the waste will be sampled for contamination in accordance with the procedures described above, or will be rejected.

In addition to consistency, the still bottom waste is inspected for color. The waste should appear dark brown or black in color. If the waste is a different color, a service representative will sample the waste for contamination in accordance with the procedures described above, or will reject the waste.

d. Paint Wastes

Safety-Kleen handles both lacquer thinner waste generated from the paint gun cleaning process and paint waste.

I. Lacquer Thinner Waste

The significant criterion for determining whether lacquer thinner waste will be accepted is volume. The solvent is provided to customers in 5 gallon pails. The paint gun cleaning machine operates as a closed system whereby there should never be a combined volume of more than 7-1/2 gallons of solvent in the two collection pails. The solvent is pumped from a tube in a left hand pail (facing the machine) through the machine into a right hand pail. The tube in the left hand pail extends exactly half way into the pail (i.e. to the 2-1/2 gallon mark). The left hand pail starts with 5 gallons of clean solvent which will be pumped out as the machine is used to clean the spray guns. This process will continue until the left hand pail contains 2-1/2 gallons of solvent. Any solvent above 2-1/2 gallons remaining in the left hand pail at the time of servicing will be pumped through the machine into the right hand pail by the Safety-Kleen service representative. Therefore, when the machine is serviced, the right hand pail will always contain 5 gallons of solvent. If a service representative discovers more than a total of 7-1/2 gallons of solvent in the two pails or there is an overfill from the right hand pail, the waste will be sampled for contamination in accordance with the procedures described above, or the waste will be rejected.

II. Paint Waste

The significant criterion for the inspection of paint waste is consistency. The waste should contain no more than 30 percent solids. The service representative will insert a long glass tube into the drum. The tube should glide easily down to the bottom of the drum. If there is resistance to the insertion of the glass tube, it is assumed that the level of solids is in excess of 30 percent and the service representative will reject the waste.

The contents of the glass tube are also visually examined for consistency and water content. The material should be a "free flowing" liquid, but should not contain a significant amount of water. If there is more than approximately 10 inches of water in the 3 foot tube (the water and paint will separate in the tube and thus can be measured) the waste will be rejected.

2.2.2. Quantitative Testing

In addition to the qualitative testing described above, Safety-Kleen will perform quantitative testing on the following terms and conditions:

a. Applicability

Quantitative testing pursuant to section III of this waste analysis plan shall not be required for the following:

1. Spent filter cartridges, powder residue and still bottoms generated by customers in the dry cleaning business; and

2. Waste generated by customers who are conditionally exempt small quantity generators [i.e. customer which generate less than 100 kg/month of waste) (40 CFR 261.5(a)].

b. Testing Frequencies

I. For all other customers (i.e. those customers who are not conditionally exempt small quantity generators) and wastes (i.e., mineral spirits, immersion cleaner, Safety-Kleen will perform quantitative testing on the following basis:

A. For customer whose waste is collected monthly, testing will be performed once per year for each customer.

B. For customers whose waste is collected weekly, testing will be performed five times per year for each customer.

C. Subject to sections B 2 and 3 below, for those customers who are borderline small quantity generators (i.e. they may occasionally generate more than 100 kg/month of waste), quantitative testing will be performed once per year for monthly customers and five times per year for weekly customers.

II. The testing frequencies set forth in section 6.I.A and B above are only applicable to those Safety-Kleen customers for which the following conditions apply:

a. With the exception of paint waste, Safety-Kleen provides the virgin product from which the waste stream in question is generated; and

b. (1) For spent mineral spirits solvent waste, Safety-Kleen physically collects each container of spent waste from its customer during Safety-Kleen's servicing of its parts washer.

(2) For spent immersion cleaner waste, Safety-Kleen physically collects each container of spent waste from its customer during Safety-Kleen's servicing of its parts washer.

(3) For spent lacquer thinner waste, Safety-Kleen physically collects each container of spent waste from its customer during Safety-Kleen's servicing of its paint gun cleaning machine.

(4) For paint waste, the generator also generates spent lacquer thinner waste from the paint gun cleaning machine supplied and serviced by Safety-Kleen, and all of the generators non-paint hazardous waste be from material originally supplied by Safety-Kleen.

III. For wastes that do not meet the conditions described in section b.2 above, each and every shipment of hazardous waste managed by Safety-Kleen shall be sampled for specific gravity in accordance with section 2.2.3.

2.2.3 Specific Gravity

A. Measurements of specific gravity to satisfy the section 2.2.2 Quantitative Testing requirements of this permit may be performed at either the customers location or at the Safety-Kleen facility.

B. Measurements of specific gravity to satisfy the section IV Quantitative Testing requirements of this permit shall be performed using only one of the following two methods: ASTM D891, Method A (Hydrometer) or ASTM D2111-71 (Hydrometer).

C. If the measured specific gravity of a waste is in the acceptable range, then Safety-Kleen may manage that waste.

If a drum of waste fails the specific gravity testing, it will be sampled for further laboratory testing in accordance with the procedures described above in Section 2.2.1.a or Safety-Kleen will not accept the waste.

1. For spent mineral spirits solvent waste, the measured specific gravity must be within the range of .765 - .935 for the spent mineral spirits to be accepted by Safety-Kleen.
2. For spent immersion cleaner waste, the measured specific gravity must be within the following ranges for the spent immersion cleaner to be accepted by Safety-Kleen:
   a. The measured specific gravity for the aqueous phase must be within the range of .90 to 1.1 and the measured specific gravity for the solvent phase must be within the range of 1.125 to 1.375, for the spent immersion cleaner to be accepted.

2.2.4 Additional Testing

For any waste which fails either specific gravity testing or is determined to be contaminated based on laboratory analysis conducted pursuant to Section 2.2.1.a above, Safety-Kleen will perform quantitative testing at the next scheduled pick-up from the generator of such waste.

2.2.5 Initial and Annual Process Description and On-Site Audits

Based on historical operating and analytical records, Safety-Kleen has determined that the characteristics of its customers' waste streams do not change from year to year. Nearly 80% of our customers are in the

automotive after-market, and our records of analyses of these customers' wastes (particularly the last 10 years) reflect that there has, in fact, been a continuing reduction in the trace levels of EP toxic constituents in these wastes. Therefore, in lieu of costly initial and annual sampling and analyses of our customer's waste streams, Safety-Kleen will perform environmental audits at customer locations.

These audits will be performed for all new and existing customers and for all new customers. Revisions will also be made to the audit when it has been determined by the customer or is evident to the Safety-Kleen representative that a change has occurred in processes in which the solvent is used or generated. All such audits will be made part of the facility's RCRA Operating Record and will be retained on site.

2.2.6 QA/QC PLAN GOAL

The analytical data collected by the service center personnel is intended to confirm the wastes collected may be safety managed on-site and that they match the descriptions on the accompanying manifest(s). Quality assurance and quality control will be followed as described in the appropriate test method(s) in SW-846.

a) Performance Evaluation of Personnel

Personnel who must sample and analyze wastes to do so at least annually.

b) Chain of Custody Procedures

Samples will be analyzed as they are collected, at the location where they are collected. Therefore, chain of custody paperwork will not be required. Records of analytical results (customer name, date sample was collected and analyzed and the analytical results) will be kept on file at the service center.

c) Use of Outside Laboratories

Outside laboratories may be used for sample collection and analyses. These laboratories must follow SW 846 methods for sampling, chain-of-custody and analyses (see tables D-1 through D-4). Samples must be disposed of or otherwise managed in accordance with 40 CFR 262, 263 and 264.

d) Analytical Results

Analytical results must be provided to the service center manager and he must keep these on file at the service center.

2.3 WASTE ANALYSES AT THE RECYCLE CENTER

Analyses performed at the Safety-Kleen recycle centers are undertaken to safeguard the recycling process and to assure the product quality. The following tables in Appendix D summarize a typical waste analysis plan practiced at the recycle center for the hazardous materials returned from the service center:

Table D-1 Parameters and Rationale for Hazardous Waste Selection

Table D-2 Parameters and Test Methods

Table D-3 Methods Used to Sample Hazardous Wastes

Table D-4 Frequency of Analysis

A profile of the paint waste is in Appendix D. It will be reanalyzed when the reclaimer to whom it is shipped requests reanalysis or when a change in the use of the product occurs.

2.4 WASTE ANALYSIS PLAN UPDATE

This waste analysis plan will be modified when a new waste product is collected or when sampling and material management methods change. Revision of the plan is the responsibility of the Environment, Health and Safety Department at Safety-Kleen's Corporate Office in Elgin, Illinois.

2.5 LAND BAN NOTIFICATION/CERTIFICATION FORMS

In accordance with 40 CFR 268.7, Safety-Kleen will provide notification/certification for wastes banned from landfills as follows:

1. Printing the Notice language on manifests-such as for core-business customers to branch shipments; or

2. Special forms for each regularly handled waste types (e.g., MS, IC, perc, freon); or

3. A general form that must be completed for unique or non-standard waste streams. These wastes will only be handled on a transfer basis in accordance with 40 CFR 263.12.

The notice is required paperwork for all Safety-Kleen waste types. Shipments lacking the proper Notice will not be accepted by any Safety-Kleen facility. When a shipment with the proper Notice is received, the Notice is kept in the files of the receiving facility with the manifest or with the pre-print if a manifest is not used.

2.6 OPERATING LOG

Safety-Kleen maintains an operating log on-site which includes 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.

These records are kept on file in the branch manager's office.

PREPAREDNESS AND PREVENTION PLAN

ABSTRACT

SECURITY MEASURES--The site is secured as follows:

a. There is a chain link fence with three strands of barbed wire around the facility.

b. Warning signs are posted at all entrances.

c. Locks are on all entrances to the warehouse and on the metal shelter.

d. Remote controls for all tank operations are inside the warehouse.

e. There is twenty-four hour outdoor lighting.

INSPECTION PROCEDURES: See Appendix E for a copy of the Facility Inspection Record.

REQUIRED EQUIPMENT--The emergency equipment requirement is met with the following:

a. Internal communications will be by voice.

b. Telephones are available in the office and the warehouse.

c. Fire extinguishers are available next to three exits in the warehouse and at the metal shelter for ignitable waste storage.

d. Water is available from the city of Albuquerque.

3.0 PREPAREDNESS AND PREVENTION PLAN

3.1 SECURITY MEASURES

The facility is secured with a six-foot high chain link fence topped by three strands of razor wire which surrounds the entire facility. All access gates are locked when the facility is unoccupied and warning signs stating "Danger - Unauthorized Personnel Keep Out" which are visible from twenty-five feet are posted at the entrances. These warning signs are posted in both English and Spanish. An electronic entrance gate is located at the front of the facility which can automatically be opened and closed to allow trucks to enter and exit. In addition, outdoor lights remain on at all times.

The office/warehouse building is secured with locks on all doors and warning signs are posted at all entrances to work and waste storage areas. These warning signs are posted in both English and Spanish.

The tanks are inaccessible in that material can not be added to or removed from them without activating the pumps, the controls for which are inside the warehouse. The pumps are not activated unless mineral spirits product or waste is being added to or removed from the tanks by Safety-Kleen personnel. The container storage areas and flammable shelter area

are also locked unless occupied by Safety-Kleen personnel. As a result the tanks and container storage areas are inaccessible except by Safety-Kleen personnel. In addition, warning signs are posted on the return and fill station. These warning signs are posted in both English and Spanish.

The overhead door to the ignitable waste shelter will be closed and locked unless containers are being added to or removed from the shelter. Warning signs are also posted on the shelter. These warning signs are posted in both English and Spanish.

3.2 INSPECTION PROCEDURES

The branch (i.e., service center) manager or his designate is responsible for carrying out and documenting the facility inspection (Appendix E) on a daily basis. He must note any repairs that are needed and assure that they are completed. If he can not carry out the repairs himself, he must notify the Technical Services Department at Safety-Kleen's corporate headquarters and request assistance. Completion of repairs must also be noted on the Facility Inspection Record.

The regional manager is the supervisor of several branch managers in a geographic area. He must review the Facility Inspection Record on a quarterly basis to insure that they are properly completed and that any necessary repairs have been effected.

The facility inspection includes the following:

a. Tank inspections--At a minimum, the tank holding the solvent product and that holding the spent solvent are inspected daily. The daily inspections include checks of the high level alarm and of the volume held in the tank and checks of the leak detection system for any releases. Sudden deviations in the solvent volumes will be investigated and their causes determined. If necessary, repairs must be initiated immediately. When the tank used to store spent solvent is 85% fill, a pickup must be scheduled with the Solvent Control Department in Safety-Kleen's corporate headquarters. The solvent must not exceed 95% of the tank volume at any time.

b. Solvent dispensing equipment--The solvent dispensing hose, connections and valves must be inspected for damage (such as cracks or leaks) and proper functioning on a daily basis. Any solvent in the hoses must be drained after use. The pumps, pipes and fittings must also be checked daily for damage and proper functioning. Any damage to the solvent dispensing equipment must be noted and repaired.

c. Drum storage areas--The three drum storage areas (including the paint waste shelter) are inspected daily and the number and condition of the drums noted. The total volume of the spent solvent held in the drum storage area must not exceed ten times the amount that can be collected in the secondary containment

system. The contents of any leaking or suspect drums must be placed in a drum of adequate integrity. Finally, the drums must be properly labeled and marked in accordance with U.S. DOT and New Mexico hazardous waste regulations. The secondary containment system must be inspected for deterioration or failure. If cracks or leaks are detected, they must be repaired immediately.

d. Route vehicles--Each route vehicle must be inspected daily to insure the proper operation of its brakes, lights, turn signals, emergency flashers and wipers. In addition, the necessary safety equipment must be on board: sorbents, fire extinguisher, eye wash, first aid kit, reflector kits, rubber gloves, plastic aprons, and safety glasses. Any missing equipment must be replaced.

e. Dumpsters--The two wet dumpsters (in the return and fill station), the two associated valves and each joint in the piping must be inspected daily for leaks and sediment buildup. A barrel washer, located inside the dumpster, uses piped-in spent solvent to rinse mineral spirits waste from the barrel and returns the rinse and spent solvent to the waste mineral spirits tank. Any leaks must be noted and repaired immediately and excess sediment must be removed from the dumpster. The dry (trash) dumpster must be inspected to insure that no liquids are being placed in it.

f. Safety equipment--The four fire extinguishers must be checked weekly to insure that the units are charged and accessible. In addition, the operation of the eyewash must be confirmed weekly and the first aid kit and sorbents must be inspected weekly for adequate content and accessibility. A list of required emergency equipment is in Appendix E.

g. Security--The operation of each gate and lock must be checked daily. In addition, the fence must be inspected for deterioration on a weekly basis.

3.3 FACILITY DESIGN

The Albuquerque service center was designed to minimize the possibility of spills or fires and to minimize the effects of any accidents which may occur. Specifications for the storage facilities, secondary containment and other equipment are in Appendix E and descriptions follow.

3.3.1 Tank Storage

The tank which was in place at the time the permit was submitted was not secondarily contained and was scheduled to be replaced by the time it was 15 years old, in March of 1992.

The 12,000 gallon storage tank is 10′6″ in diameter and 18′6″ long. It is constructed of 1/4″ thick carbon steel and is double-walled. It is constructed in accordance with Underwriters Laboratories Standard 142 and is located more than 5 feet from the building foundation, in accordance with NFPA requirements. A liquid-sensing leak detector is between the two walls, and must be checked daily (see Sheet 1 of 3 of drawing D13617).

The exterior of the outside tank is coated with a plastic-fiberglass mixture so that no metal is exposed and the tank is isolated from electrical currents.

A manually-controlled waste feed cut-off valve located adjacent to the wet dumpsters at the return/fill station, can prevent the tank from being overfilled. The tank is equipped with an aural (siren) and visual (strobe light) high level alarm system which will alert employees when the tank is approximately 600 gallons from being full. The 300 gpm pump on the tanker truck can be turned off immediately wen the alarm sounds. A manual button can be used to test the alarm to insure the system is operable. The fill pipes are secondarily contained to prevent spills during loading and unloading operations.

The return and fill station is a sheet steel structure as are the dumpster and the secondary containment. The dumpsters are tight-piped to the tank. All piping is aboveground and all joints are welded. The following procedures are followed when loading and unloading solvent into the tanks:

1. Secure the tractor-trailer for unloading or loading in a location which has easy access to the pump or curb side of the unit. Set brakes, engage governor and hook up grounding equipment.

2. Check available tank volumes via gauges or measure with a stick to verify that there is enough volume to transfer each load safely and prevent overfills. Leave all hatches open on storage tanks and on the tanker truck.

3. Make hose connections between storage tank and tanker truck in proper sequence (i.e., to empty vessel first). Double check to insure all connections are tight and locked.

4. Engage pump and move clean product to storage tank. Check for leaks along hose, piping and at connections. If a leak is noted, stop the operation immediately and make repairs or make arrangements for repairs.

5. Check the available tanker truck volume. Reverse hose connections and move dirty solvent from storage to tanker truck. (Again, check for leaks and repair as needed).

6. Drain all hoses before disconnecting to prevent spillage.

7. In the event of a spill, follow the emergency procedures outlined in the Contingency Plan.

8. Check all paperwork; document proper quantities of material delivered and picked up. Insure all manifests, bills of lading and other related paperwork are in order.

In the event of a spill or leak, the procedures described in the Contingency Plan will be followed. A minor spill will be handled as described in section 4.3.1 and a major spill as in section 4.3.2. All accumulated material will be pumped to the used solvent storage tank. Any solvents or oil dry used in the cleanup will be containerized, labeled and handled as hazardous waste. All equipment used will be decontaminated and the rinse water will be handled as a hazardous waste.

3.3.2 Drum Storage

The slab, curbing and collection trenches for the drum storage areas in the warehouse are made of steel-reinforced concrete and the concrete has been poured so that no cracks or gaps exist between them. The curbing is four inches high and six inches wide and encompasses the storage area except where there is a trench. Steel grates cover the trench to facilitate the movement of drums across it. The concrete is coated with chemical-resistant epoxy and urethane so as to be impermeable. The solvents in storage are only incompatible with strong oxidizers and reactive metals, none of which are present in the base or sealants. Ignitable wastes in containers are stored at least fifty (50) feet from the property line.

The ignitable waste shelter and its secondary containment are constructed of sheet steel and it is painted light colors (white and beige) to reflect sunlight. An overhead door secures the shelter when drums are not being added to or removed from it.

3.3.3 Compatibility of Containers with their Contents and Each Other

The mineral spirits, immersion cleaner, dry cleaning waste and paint wastes are compatible with the drums in which they are stored; in fact, mineral spirits is sometimes used as a rust-preventive coating for steel. Immersion cleaner, mineral spirits, and paint waste are stored in steel drums.

Dry cleaning wastes are stored in blue steel and black polyethylene drums both of which are DOT-approved containers. The polyethylene drums have been treated with fluorine gas to be resistant to dry cleaning solvents. Immersion cleaner and dry cleaner waste are never opened at the branch facility. Containers in the warehouse will be palletized to facilitate storage shipping. The ignitable waste shelter has a grating floor which is elevated about three feet above the secondary containment pans so palletizing is not required in this unit. Since none of the wastes handled by Safety-Kleen react with steel or polyethylene, compatibility is assured.

3.4 PLANT OPERATIONS--POTENTIAL SPILL AND FIRE SOURCES AND CONTROL PROCEDURES

Employees must perform their duties in the safest, most efficient manner possible and the service center has been equipped to facilitate these activities. Drums will be moved using a handcart and pallets using a forklift or pallet jack. Upon arrival at the service center, containers of spent solvent must immediately be added to the storage tank or placed in the drum storage areas. Open drums of solvent must not be left unattended. A container holding hazardous waste must always be closed during storage except when it is necessary to add or remove waste. Below are descriptions of situations which can result in accidents and the precautions taken to prevent their occurrences.

3.4.1 Potential Minor Spill Sources

The following is a list of activities that have the potential for a minor (one that can be remediated without assistance from a clean up contractor) pollution incident:

a. Pouring of drummed solvent into the dumpster--As the 16- and 30-gallon drums are poured into the dumpster, solvent can splash out. Employee training emphasizes the importance of taking care in emptying the drums. The return and fill station is underlain by a metal pan with a floor drain that empties into the storage tank. This design will contain this type of spill.

b. Filling of drums with solvent product--A low pressure hose with an automatic shut-off valve, similar to those used at automotive service stations, is used to fill the drums with solvent. Leaking fittings, a damaged hose or carelessness could lead to the discharge of solvent outside of the drum. Manual emergency shut-off valves are on each hose, should the equipment not function properly. In addition, employee training emphasizes the importance of inspection, maintenance and reporting of conditions with pollution incident potential.

c. Moving of containers--When a container is moved, a potential exists for it to tip over. To minimize the potential for spillage of solvent, all containers must be maintained in an upright position and remain tightly covered while in storage or in transit.

d. Delivery truck transfers--The cargo should be secured in the route vehicle with straps before transport. Individual containers of solvent can tip over or be dropped when being moved on or off a delivery truck so transfers will be made using a handcart and a hoist, if necessary.

If a spill does occur, the amount of solvent in the containers is a quantity which can be collected with sorbent clay or pads. Any contaminated soil that results will be removed manually, drummed and shipped to a Safety-Kleen recycle center for proper disposal.

3.4.2 Potential Major Spill Sources

The following activities have the potential for a major (one for which remedial action will require assistance) pollution incident:

a. Overfilling of storage tanks--Both product and spent solvent tanks can be overfilled with a resulting discharge of solvent. A high level alarm and daily checks of tank volumes will prevent this type of incident.

The product stored in the tanks at this facility is mineral spirits which is compatible with the carbon steel structure; in fact, mineral spirits is often used as a light hydrocarbon coating to prevent rusting of metal parts.

In addition to the daily inspection, an assessment of the tanks will be performed every five (5) years. The tanks were assessed by January 12, 1988, in accordance with 40 CFR 264.191. If, during any inspection, corrosion is noted, it will be removed and the tank repaired. If corrosion is significant and localized, the tank will be immediately taken out of service and repaired, (i.e., a patch welded over the corroded area). Should the corrosion of the vessel be extensive or if the tank is found to be leaking, the vessel will be immediately taken out of service and replaced.

3.4.5 External Factors

The design of the installation is such that a harmful spill is highly unlikely to occur from most external factors. The storage tanks are inaccessible to non-Safety-Kleen personnel and the pump switches are located inside. Also, the drum storage areas are in buildings which are inaccessible to unauthorized personnel.

a. Vandalism - Only extreme vandalism would result in a solvent spill or fire. Responses to spills and fires are described in the contingency plan.

c. Adequate aisle space is maintained to allow the unobstructed movement of personnel, fire protection equipment, and decontamination equipment to any area of the facility operation in an emergency.

d. "No Smoking" signs are posted in areas where solvents are handled or stored.

e. Fire extinguishers must be checked once per week and tested by the fire extinguisher company once per year.

The solvents stored on-site are only incompatible with strong oxidizers and reactive metals, none of which are present on-site. They are therefore compatible with one another and their mixing will not cause a strong reaction. The fan in the warehouse must be turned on five minutes before entering the container storage area and all day, until operations cease for the day, to prevent the accumulation of toxic vapors. Industrial hygiene studies have been performed at Safety-Kleen facilities and employees have not been found to be over-exposed to air contaminants.

3.4.4 Tank Evaluation and Repair Plan

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.

b. Leaking pipelines--The pipelines and other equipment present a potential for leaks and resultant pollution. Regular inspection of this equipment and the solvent inventory will detect any leaks.

3.4.3 Potential Fire, Incompatibility and Vapor Build Up Sources

The following is a list of fire prevention and minimization measures:

a. All wastes and products are kept away from ignitable sources--Personnel must confine smoking and open flames to remote areas, separate from any solvent (e.g., the office or locker room). The mineral spirits handling area, ignitable waste shelter and the storage tanks are separated from the warehouse building area to minimize the potential for a fire to spread or injury to personnel to occur.

b. Ignitable wastes are handled so that they do not:

1. become subject to extreme heat or pressure, fire or explosion, or a violent reaction--The mineral spirits waste is stored in a tank or in drums, none of which are near sources of extreme heat, fire, potential explosion sources or subject to violent reactions. The tanks are vented and the drums kept at room temperature to minimize the potential for pressure build up.

2. <u>produce uncontrolled toxic mists, fumes, dusts or gases in quantities sufficient to threaten human health</u>--The vapor pressure of mineral spirits is low (2 mm) and it is reactive with strong oxidizers only. Toxic mists, fumes, dusts or gases will not form in quantities sufficient to threaten human health since strong oxidizers are not handled at this facility and the solvent vaporization will be minimal under normal working conditions. The tanks operate under atmospheric temperature and pressure and are vented to prevent the accumulation of vapors. Monitoring of vapors is not necessary as, under normal circumstances, the 6% concentration of the lower explosive level is not possible. The paint waste storage shelter was built in accordance with local and national fire codes to minimize the potential for fires and explosions.

3. <u>produce uncontrolled fires or gases in quantities sufficient to pose a risk of fire or explosion</u>--See 'a' above and 'c' below.

4. <u>damage the structural integrity of the Safety-Kleen facility</u>--The mineral spirits and paint wastes will not cause deterioration of the tank, drums or other structural components of the facility.

b. Strikes - A strike would not result in a solvent spill or fire.

c. Power failure - A power failure would not result in a spill or fire. Should a power failure occur, all activities requiring electricity will cease.

d. Flooding - The site elevation is above the projected 100-year flood plain; therefore, a 100-year flood will not affect the facility.

e. Storms or Cold Weather - The solvent return and fill station is roofed to eliminate the possibility of rain or snow entering the dumpsters. No opportunity is foreseen to affect the facility with snow, cold weather or storm water.

3.5 INTERNAL AND EXTERNAL COMMUNICATIONS AND ALARM SYSTEMS

Because the facility is small, internal communication within the building and the solvent return/fill area is accomplished by voice. An alarm is located at the return/fill station which, when pressed, will sound throughout the warehouse if the employee at the return/fill station needs assistance. Telephones will be used to report a spill or a fire and to summon assistance from local and state emergency response agencies. Branch managers have emergency phone numbers of local and state emergency response teams posted by each phone located in the sales office. Included in these phone numbers is the 24-hour telephone number which can be used to contact the Environment, Health and Safety Department.

CONTINGENCY PLAN

ABSTRACT

CORPORATE HEADQUARTERS:	Safety-Kleen Corp. 777 Big Timber Road Elgin, IL 60123 708/697-8460
RESPONSIBLE OFFICIALS:	David A. Dattilo Vice President, Sales and Service Scott E. Fore Vice President, Environment, Health and Safety
FACILITY ADDRESS:	Safety-Kleen Corp. (7-008-01) 2720 Girard NE Albuquerque, NM 87107
TELEPHONE NUMBER:	505/884-2277
U.S. EPA I.D. NUMBER:	NMD 000804294
GEOGRAPHIC LOCATION:	35° 06′ 44″ N 106° 36′ 46″ W
OWNER:	Safety-Kleen Corp.
DATE OPERATIONS BEGAN:	March 1, 1977

DESCRIPTION OF ACTIVITIES: This facility is an accumulation point for spent solvents generated by Safety-Kleen customers, the majority of whom are small quantity generators. All wastes are ultimately shipped to a Safety-Kleen recycling facility or a contract reclaimer and then returned to the Company's customers as product.

PROPERTY DESCRIPTION: About 1.05 acres with the following structures:

a. one building with offices and a warehouse with two areas for container storage;

b. two underground double-walled storage tanks (one for product and one for spent solvent);

c. one loading dock with a solvent return and fill station; and

d. one enclosed shelter to be used for container storage.

FACILITY TYPE: Storage in an aboveground tank (S02) and in containers (S01)

STORAGE UNIT	CAPACITY (GAL.)	SECONDARY CONTAINMENT(GAL.)	MATERIAL TO BE STORED
Tank	12,000	*	Spent Mineral Spirits Solvent (D001)[1]
Container Storage--east Warehouse	2,592	448.4	Spent Immersion Cleaner (F002, F004)[1] Dry Cleaning Waste (F002)[1]
Container Storage--West Warehouse	3,456	549.8	Spent Immersion Cleaner (F002, F004)[1] Dry Cleaning Waste (F002)[1]
Container Storage--Metal Shelter	1,092	1,122	Paint Waste (D001, F003, F005)[1] Dumpster Sediment (D001, D006, D008)[1]

* indicates double-walled tank

1 D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042 and D043

PURPOSE: This plan describes the proper action to be taken by employees during an emergency.

RESPONSIBILITIES: The emergency coordinator or his alternate is responsible for implementing the plan during an emergency.

EMERGENCY COORDINATOR: The branch manager is the emergency coordinator. The alternate emergency coordinator is the branch secretary.

EMERGENCY NOTIFICATIONS:

Albuquerque Police Department	911 or 505/768-1986
Albuquerque Fire Department	911 or 505/243-6601
Lovelace Hospital	505/345-3655
Environment, Health and Safety Dept.	708/888-4660
New Mexico Health and Environment Dept.	505/827-9329 (24 hrs.)
Rinchem	505/345-3655

4.0 CONTINGENCY PLAN

Safety-Kleen Corp. (7-008-01)
2720 Girard NE
Albuquerque, New Mexico 87107

4.1 PURPOSE

The contingency plan describes the actions to be taken by each employee in the event of a spill, fire or other emergency. It includes the information necessary to address emergency situations efficiently and in such a manner as to prevent or minimize hazards to human health or the environment due to fire, explosion, or any other release of hazardous materials to the air, soil, surface water, or ground water.

The contingency plan is to be carried out immediately whenever there is a release of hazardous material which could threaten human health or the environment, implementing the procedures contained in this plan.

4.2 EMERGENCY COORDINATOR RESPONSIBILITIES

The emergency coordinator is responsible for implementing the contingency plan during an emergency; however, all employees must be familiar with the procedures in this plan and are responsible for proper implementation of the plan should the emergency coordinator or his alternate be unavailable. The branch manager is the emergency coordinator and the branch secretary is the alternate emergency coordinator.

The emergency coordinator and his alternate must be familiar with all aspects of this contingency plan, the operations and activities at the facility, the location and characteristics of materials handled, the location of all records within the facility and the facility layout. In addition, these coordinators have the authority to commit the resources necessary to carry out the contingency plan. Their home addresses and telephone numbers, as well as the office telephone number, are listed in Appendix F. Also listed in Appendix F are the assigned duties of each employee during an emergency. At least one employee will be at the facility or on call to respond to an emergency situation.

4.2.1 Responsibilities During an Emergency

Whenever there is an imminent or actual emergency situation, the emergency coordinator (or his alternate when the emergency coordinator is not available) must immediately:

a. activate the internal facility communication system to notify all facility personnel;

b. notify Safety-Kleen's Environment, Health and Safety Department using the 24-hour telephone number after working hours - 708/888-4660; and

c. notify appropriate state or local agencies with designated response roles, if necessary.

Whenever there is a release, fire, or explosion, the emergency coordinator must immediately try to identify the character, exact source, amount, and extent of any contamination. Because of the limited number of materials being handled at the facility, he or she may do this by observation or by review of facility records. If necessary, outside laboratories may be contacted to perform chemical analysis.

Concurrently, the emergency coordinator must assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire, or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that may be generated, or the effects of any hazardous run-off).

During an emergency, the emergency coordinator must take all measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures must include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers.

4.2.2 Remedial Action Responsibilities

If the environment has been contaminated or there is a potential for contamination as a result of a fire, explosion, or spill, the emergency coordinator must contact the Environment, Health and Safety Department to

report the incident. All releases, fires, and explosions; necessitate the implementation of this contingency plan. Any situation that has the potential for releasing solvent or solvent vapors or causing a fire or explosion must be addressed according to this plan. Should there be any questions as to whether this plan should be implemented (i.e. a problem is suspected but cannot be confirmed) the EHS or Technical Services Dept. must be contacted and assistance requested. The treatment, storage and/or disposal of the recovered waste, contaminated soil or surface water that results must be arranged by Safety-Kleen and carried out as expeditiously as possible.

The emergency coordinator must ensure that, in the affected area(s) of the facility:

a. no substance that may be incompatible with the released material is brought on site until cleanup procedures are completed; and

b. all emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

4.2.3 Reporting Responsibilities

If the emergency coordinator determines that the facility has had a release that could threaten human health or the environment, the coordinator must report those findings as follows:

a. If the assessment indicates that evacuation of local areas may be advisable, the coordinator must immediately notify appropriate authorities.

b. The coordinator must immediately notify the Environment, Health and Safety Department. The department will notify the New Mexico Health and Environment Department (HED), of any spill or release of hazardous waste within 24 hours (except for spills of one pound or less that are immediately cleaned up). The department will report to the New Mexico Health and Environmebt (HED) the following:

(1) name and telephone number of notifier;
(2) name and address of facility;
(3) time and type of incident (e.g., release, fire);
(4) name and quantity of material(s) involved, to the extent known;
(5) the extent of injuries, if any; and
(6) the possible hazards to human health, or the environment outside the facility.

Safety-Kleen will notify the appropriate state and local authorities that the facility is in compliance with section 4.2.2 before operations are resumed in the affected area(s) of the facility.

The emergency coordinator must document the time, date, and details of any incident that requires the implementation of the contingency plan. Within 30 days of the incident, Safety-Kleen will submit a written report on the incident to the New Mexico HED. The report must include:

a. name, address, and telephone number of the owner or operator;

b. name, address, and telephone number of the facility;

c. date, time, and type of incident (e.g., fire, explosion);

d. name and quantity of material(s) involved;

e. the extent of injuries, if any;

f. an assessment of actual or potential hazards to human health or the environment, where this is applicable; and

g. estimated quantity and disposition of recovered material that results from the incident.

4.2.4 Chain of Command

Based on the emergency response procedures described above, the chain of command during an emergency is as follows:

a. The person who discovers/causes the spill reports to the emergency coordinator.

b. The emergency coordinator contacts the Environment, Health and Safety Dept.

c. The Environment, Health and Safety Department reports to the New Mexico HED.

4.2.5 Government Agencies and Local Authorities to Be Notified

During an emergency, the following government agencies and local authorities may be contacted:

Agency or Authority	Rationale
Police Department	Notify if there is imminent danger to human health.
Fire Department	Notify if there is a fire, uncontrolled spill, or other imminent danger.
Hospital	Notify if there are any injuries.
New Mexico HED	Report releases and fires.
Rinchem	Call to assist with remedial action after a release.

Arrangements have been made to familiarize the police department, fire department and local emergency response teams with the layout of the facility, the properties of hazardous materials handled and associated hazards, locations where facility personnel normally work, entrances to and roads inside the facility, and possible evacuation routes. Arrangements have also been made to familiarize the local hospital with the types of injuries or illnesses which could result from fires, explosions, or releases at the facility. Copies of the letters to the local police department, fire department and hospital are in Appendix F.

4.3 EMERGENCY RESPONSE PROCEDURES

Response actions to be taken in specific emergency situations are described in the sections which follow. Employees must assess the possible hazards to human health or the environment resulting from a release or fire by visually inspecting the area, reviewing Material Safety Data Sheets for the materials released and estimating the extent of the release and identifying the media to which it was released (e.g. soil, water).

4.3.1 Minor Spills

If a spill should occur while pouring spent solvent into a dumpster or filling drums with solvent product at the return and fill station, and it is contained in the secondary containment at the base of the return and fill station, remedial action will not be necessary. Should the spill occur outside the containment, different actions must be taken depending on whether the spill occurs on a paved or unpaved area:

a. If the solvent spills on a paved area, it must be collected with sorbent sheets and/or sorbent clay (such as "Oil Dry"). The sorbents will be collected, drummed and shipped to the Safety-Kleen recycle center for proper disposal.

b. If the solvent spills on an unpaved area, the free solvent must be collected with sorbent material. The sorbent material and any contaminated soil must be collected, drummed and shipped to a Safety-Kleen recycle center for proper disposal.

If a spill occurs while moving or delivering drums outside of the warehouse, the response actions described in 'a' and 'b' above must be followed. Spills inside the warehouse and the paint waste shelter will be prevented from contaminating the environment by the concrete floor and the secondary containment. In the event of a spill indoors, the doors and windows should be opened to improve the ventilation in the confined area. If solvent is spilled in a non-explosion rated area or is flowing in such, insure that all sources of ignition (e.g., thermostats or light switches) are left in the same position (either on or off) as at the time of the spill. Then, following the instructions of the appropriate Material Safety Data Sheet (Appendix F), the worker will enter the area wearing rubber gloves, aprons, safety glasses, and/or a respirator, collect the liquid, drum it and return it to storage. An explosion- proof area is one which special wiring has been used which prevents the likelihood of an explosion. Only the return and fill station contains this type of wiring.

Cleanups are completed only when the workers have cleaned themselves and the emergency equipment with soap and water. All minor spills must be reported to the Environment, Health and Safety Department and the department will contact the New Mexico HED, if required.

In the event a container needs emptying, a pump located on the facility will be sued to remove the liquid and pump it to a new container. In the event the liquid from a tank needs to be removed, tanker trucks will be used to remove the liquid and haul it to a recycle center. A wet/dry vacuum is present at the site to be used in the event of a minor spill. sorbent pads can also be used to wipe up any minor spills.

4.3.2 Major Spills

Any spill which can not be completely remediated using the methods described in 'a' and 'b' of section 4.3.1 is a major spill. A major spill is usually the result of a vehicular accident, tank overfilling, equipment failure or a fire. Spilled material which escapes collection can contaminate soil, surface water, ground water, sanitary sewer systems and storm sewer systems. Emergency response to this type of spill should be as follows:

a. Assist any injured people.

b. Stop the flow of solvent, if possible.

c. Retain, contain or slow the flow of the solvent if it can not be stopped.

d. If solvent escapes your containment efforts, immediately call the local Fire Department, and report to the emergency coordinator and the Environment, Health and Safety Department.

e. Immediately recover the spilled solvent to reduce property and environmental damage. Start recovery operations immediately.

f. Contact the spill clean up contractor and request clean up assistance.

The emergency coordinator shall report any incident as soon as possible to the Environment, Health and Safety Department using the 24-hour telephone number: 708/888-4660. If the Environment, Health and Safety Department does not respond within thirty minutes, the emergency coordinator shall call an emergency cleanup response contractor, if it is deemed necessary, and report the incident to the National Response Center (telephone: 800/424-8802) and New Mexico HED (telephone: 505/827-9329 - 24 hour number). Otherwise, the Environment, Health and Safety Department will contact the proper authorities.

The person reporting a spill should be prepared to give his name, position, company name, address and telephone number. The person reporting should also describe the material spilled and, if possible, some estimate of the amount, and the containment status and specify any equipment needed.

Contaminated material resulting from remedial actions for major spills, will usually be disposed of at a properly permitted treatment or disposal facility since the quantity of waste material will probably exceed the storage capacity of the Safety-Kleen recycle center.

Contaminated equipment resulting from remedial actions for spills must be cleaned and decontaminated. If it is a paved or metal surface, this can be done using a detergent solution.

Every spill must be recorded on the Spill Report Telephone Log (Appendix F) and reviewed with branch personnel to prevent similar spills from occurring in the future. A copy of this report is sent to the Environmental Affairs Department.

4.3.3 Fire Control Procedures

If a fire occurs, personnel must act quickly with the fire extinguisher to put out the fire before it spreads. If it can not be extinguished immediately, evacuate the facility and call the fire department.

Vapors of mineral spirits exposed to a spark or open flame can flash at temperatures over 105° F. A mineral spirits fire can best be extinguished with foam. If foam is not available, sweeping the fire with water fog can cool it, directing the water spray to push the flames into a

confined area, if possible. The flame should not be extinguished until the flow of the solvent has been stopped. Then attention should be directed immediately to extinguishing the flame.

Immersion cleaner (which is a mixture of chlorinated solvents, cresylic acid and an alkaline solution), and dry cleaning wastes are not flammable (see section IV of the appropriate Material Safety Data Sheet in Appendix F) but can produce phosgene gas and hydrochloric acid at very high temperatures (about 1200° F). The potential for the materials reaching a decomposition state is minimal; however, branch personnel and local authorities must be aware of the proper response, should a fire affect the drum storage areas:

a. Isolate the hazard area and deny entry to unauthorized personnel.

b. Stay upwind; keep out of low areas.

c. Ventilate closed spaces before entering them.

d. Wear positive pressure breathing apparatus and protective clothing.

e. Evacuate a 600 foot radius area endangered by the gas.

A fire in the drum storage area can best be extinguished by foam, water fog, or water spray.

Paint wastes can generate carbon monoxide and other poisonous gases. Therefore, it is important to wear positive pressure breathing apparatus and full protective clothing in the affected area. If a fire in or near the ignitable waste shelter occurs:

a. Isolate the area and deny entry to unauthorized personnel.

b. Stay upwind; keep away from low areas.

c. Wear protective clothing and self-contained breathing apparatus.

A dry chemical, carbon dioxide or foam will best extinguish the fire. Cool the shelter and containers with water until well after the fire has been extinguished.

Explosions may result in the spread of fire, unstable structures, and other hazardous conditions at the facility. Therefore, the site must not be re-entered until the fire department and Safety-Kleen's insurance company have determined it is safe to do so. Action must be taken to ensure fires, explosions or releases do not occur or reoccur. These include removing the source of the problem, repairing or remediating the source of the problem, cooling areas subject to fires and explosions and replacing faulty equipment.

4.4 EVACUATION PLAN

Clearly marked exits exist in the warehouse and office area and employees are trained to be aware of all potential escape routes.

The signal for evacuation is either a verbal or loudspeaker announcement describing the hazard and indicating the need for evacuation.

When an uncontrolled fire or release has occurred, all personnel are to be evacuated from the area and assemble across Girard Avenue to assure that all personnel are accounted for and out of the hazardous area. The fire department must be notified at the time of evacuation either from a safe on-site building or from a neighboring facility.

4.5 ARRANGEMENT WITH EMERGENCY RESPONSE CONTRACTORS

The emergency coordinator and his alternates have been trained using this contingency plan as well as in a classroom setting. They have preferences such as various state members at the corporate office and the Material Safety Data Sheets to help them make a decision during an emergency.

An emergency response contractor is identified on the Emergency Information sheet (Appendix F). This contractor will provide emergency assistance during a release and/or cleanup.

4.6 IMPLEMENTATION SCHEDULE

Any discrepancies or deficiencies found during the routine inspection must be corrected expeditiously to insure that the problem does not lead to an environmental or human health hazard. Where a hazard is imminent or an accident has already occurred, remedial action must be taken immediately. The branch manager has the overall responsibility for remediating any discrepancies found during the routine inspection, and will consult with the corporate environmental and engineering staffs to design an implementation schedule for remedial action.

4.7 AVAILABILITY AND REVISION OF THE CONTINGENCY PLAN

This plan and all revisions to the plan are kept at the facility and regularly updated throughout the operating life of the facility. Copies of this document are provided to local authorities and organizations listed on the Emergency Information sheet (Appendix F) and they may be called upon to provide emergency services. In addition, this plan and all revisions to the plan are made readily available to employees working at the facility.

The plan is reviewed and updated, if necessary, whenever:

a. the facility license is modified to allow new process wastes to be stored or treated, or applicable regulations are revised;

b. the list or location of emergency equipment changes;

c. the facility changes in its design, construction, operation maintenance, or other circumstances in a way that:

(1) increases the potential for fires, explosions, or releases of hazardous constituents, or

(2) changes the response necessary in an emergency;

d. the names, addresses, or phone numbers of emergency coordinators change;

e. the employee assigned to each emergency task changes; or

f. the plan fails when implemented in an emergency.

PERSONNEL TRAINING

ABSTRACT

OBJECTIVE: The purpose of training is to familiarize employees with environmental regulations, records and emergency procedures so they can perform their jobs in the safest and most efficient manner possible. The program is designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment and emergency systems.

TIME OF TRAINING

JOB TITLE	Prior to Starting Work	On the Job	Annually	When Regulations and/or Procedures Change
Branch Manager	X		X	X
Branch Secretary		X	X	X
Sales Representative	X	X	X	X
Warehouseman		X	X	X

5.0 PERSONNEL TRAINING

5.1 OUTLINE OF TRAINING PROGRAM

Each employee is trained to operate and maintain the facility safely, and to understand hazards unique to his job assignment. New branch managers must complete an introductory training program before starting their jobs, with annual review and update thereafter. Appendix G contains information on service center personnel and trainers, job descriptions, training outlines and training record forms. All employees at the facility have had training that satisfies the requirement of Pt. V 264.16. The persons listed in the resumes in Appendix G are personnel working for Safety-Kleen Environment, Health and Safety Department. all of these people put input to Safety-Kleen training program and any of them may participate in actual training. Robert Wachsmuth, regional environmental engineer, directly trains new branch managers. The branch manager, in turn, trains his employees. An employee may not work in an unsupervised position until he or she has received proper training as outlined in Appendix G.

5.2 ORGANIZATION STRUCTURE AND JOB DESCRIPTIONS

Environmental compliance and training of branch employees is the responsibility of the branch manager. The Environment, Health and Safety Department, in turn, provides a training program to be executed annually. Job descriptions for branch personnel are in Appendix G.

5.2.1 Branch Manager

The branch manager is ultimately responsible for the operations at the service center. The sales representatives, secretary and warehouseman report to the branch manager and he, in turn, must provide the training and materials necessary for the branch employees to execute their duties. With respect to environmental compliance, the branch manager must:

a. keep the service center clean and orderly;

b. execute or designate an employee to execute the daily inspection, keep a written log and remediate any problems;

c. know the potential hazards of the material and wastes handled on site;

d. identify potential spill and fire sources and be able to execute the contingency plan;

e. inform all employees of their environmental responsibilities;

f. act as emergency coordinator and notify the proper authorities during an emergency, remediate the situation to the best of his abilities, and submit necessary reports to the corporate office; and

g. maintain all environmental records (such as manifests, training records and spill reports) on file.

The branch manager is trained (see section 5.3.1) sufficiently that he is able to perform as a trainer himself for his employees.

5.2.2 Environment, Health and Safety Department

Safety-Kleen's Environment, Health and Safety (EHS) Department operates out of the corporate office in Elgin, Illinois. Each regional environmental engineer who works in this department is responsible for compliance of the service centers in a given geographic area of the country. The EHS Department must:

a. provide a training program which addresses the requirements of environmental regulations and corporate policy;

b. notify the proper authorities, oversee remedial actions and submit a written report to the state after an emergency situation has occurred;

c. assure that environmental permits are submitted and updated as required; and

d. manage any environmental compliance issues which exceed the resources available at the service center level.

e. Participate in training new branch managers. Resumes for those employees responsible for training new branch managers are in Appendix G.

5.3 DESCRIPTION OF THE TRAINING PROGRAM

Employee training is accomplished using classroom, videotape, written and on-the-job methods. The EHS Department prepares a training program for employees and they must provide documentation that the program has been executed.

An employee is trained prior to starting or as soon as he or she begins working, (depending on his or her position), and annually thereafter. Training program outlines are in Appendix G.

5.3.1 Training of New Branch Managers

New managers are trained for several weeks before they begin their new positions. This training is both in situ and classroom modes. While being trained at a designated "training facility", a new manager reviews all environmental records and learns the recordkeeping requirements. These records include: manifests, personnel records, training records, facility inspection records, and spill reports.

The training culminates in four weeks of training at his new facility, at least one day of which is devoted to environmental training with his regional environmental engineer. At least eight hours consists of an introduction to environmental law and a review of the Part B, including the Waste Analysis Plan, Preparedness and Prevention Plan, Contingency Plan, Training Plan and Closure Plan. This training is outlined in Appendix G.

Additional time is spent reviewing past environmental compliance at the branch manager's facility and regulations unique to his state are discussed as well.

5.3.2 Training of New Branch Secretaries

Branch secretaries are trained in the proper recordkeeping procedures as soon as they begin working for Safety-Kleen. While they are not usually responsible for preparing the documentation, they must check it for accuracy and completeness and then process or file it as required. Additional training is overseen by the branch manager and is done within six months of starting. It includes the items listed in the Introductory and Annual Training Topics for Branch Employees (Appendix G) which are explained in company-produced videotape presentations on emergency response, shipping documents (including manifests), drum labels and other safety and environmental compliance issues. In addition, the contingency plan must be reviewed with the branch manager within the first two weeks of the secretary starting work.

5.3.3 Training of New Sales Representatives

New sales representatives are trained in situ for two weeks during which they are introduced to manifests, facility inspection records and training records. A sales representative may also be trained as the designate for performing the facility inspection. Additional training is

in the form of videotape presentations and a review of the contingency plan. The contingency plan must be reviewed with the branch manager before the sales representative formally begins his new position and annually thereafter. All items listed in the Introductory and Annual Topics Training for Branch Employees (Appendix G) must be explained within six months of starting.

5.3.4 Training of New Warehousemen

A warehouseman is trained to maintain the service center and assist the other branch employees in their tasks. He may be a designate for the facility inspection and must be trained by the branch manager as such. Within two weeks of the warehouseman's starting, the branch manager must review the contingency plan with him, and within six months he must review the items listed in the Introductory and Annual Training Topics for Branch Employees (Appendix G).

5.3.5 Annual Training

On an annual basis, employees are trained using a program prepared and updated annually by the EHS Department. The regional engineer must insure that the program has been executed. It includes updates on environmental regulations, an in-depth review of the contingency plan and a review of RCRA inspection criteria.

All service center employees must annually review the items listed in the Introductory and Annual Topics for Branch Employees. This review is in the form of videotapes and a review and discussion of the storage facility permit application. In addition, periodic memoranda on changes in environmental regulations are issued by the EHS Department and must be read and discussed by all branch personnel.

5.4 TRAINING RECORDS

All training must be documented using the record forms in Appendix G. The records must be kept on file at the facility until closure. Employees may not work in unsupervised positions until the Contingency Plan has been reviewed and they understand emergency response procedures.

CLOSURE PLAN

ABSTRACT

LOCATION ADDRESS: Safety-Kleen Corp. (7-008-01)
2720 Girard NE
Albuquerque, NM 87107

U.S. EPA I.D. NO: NMD 000804294

WASTE UNITS TO UNDERGO CLOSURE:

a. Tank Storage - one 12,000 gallon underground double-walled storage tank

b. Drum Storage - an area of about 353 square feet with a storage capacity of 2,592 gallons and an area of about 900 square feet with a storage capacity of 3,456 gallons.

c. Return and Fill Station - The location of this waste management unit is shown in the Site Plan. This structure can hold 550 gallons of dumpster sediment.

d. Ignitable Waste Shelter - The location of this structure is shown in the Site Plan. It has a storage capacity of 1,092 gallons.

The volumes shown above are the maximum amounts which will be stored at this facility.

6.0 CLOSURE PLAN

6.1 PURPOSE

The Albuquerque service center operates as a storage facility for hazardous wastes, and Safety-Kleen believes it is required that it be closed in accordance with the closure requirements of New Mexico Hazardous Waste Management Regulations 206.C. Closure of the facility will be carried out in accordance with the steps outlined in this plan and Appendix H contains an estimated schedule and cost for the completion of closure. Safety-Kleen will remove all hazardous wastes and residuals from the facility and will therefore eliminate the need for further maintenance and care. An outside contractor will be performing the closure clean-up and sampling activities. The contractor will have worked with Safety-Kleen prior to clean-up so we can be aware of their capabilities. A state licensed Professional Engineer will be on site periodically to certify the adequacy of the clean-up activity.

6.2 UNDERGROUND TANK AND ASSOCIATED PIPING

To safely clean and decommission the underground storage tank:

a. Remove the remaining material from the tank and return the materials to a reclaimer.

b. Provide access to the tank.

c. Rinse, scrape and squeegee the tank interior, removing all residual waste material and rinsate.

d. Disconnect and decontaminate all appurtenant piping and pumping equipment.

e. Remove tank and appurtenant equipment and reuse or sell as scrap.

f. Backfill all excavations with clean fill materials.

g. Transport and dispose of all waste material generated during the project.

6.2.1 Removal of Waste Material and Opening of the Tank

The contents of the tank must be removed using a pump, vacuum or similar equipment and then be shipped by tanker truck to a reclaimer.

To gain access to tanks, use the manway at the top of the tank. Depending on the type of opening and the condition of the equipment, a variety of tools may be used to open the manway. Care must be exercised to minimize spark generation when working on the tank.

Prior to entering the tank, personnel should have full face respiratory protection and protective clothing. Once the tanks have been opened, they must be provided with positive ventilation. The tanks will then be inspected to determine the approximate quantity and physical conditions of any remaining waste material.

6.2.2 Removal of Residual Waste and Cleaning of Tank

Before removing any residual waste from the tank, all piping and appurtenant equipment will be flushed with clean mineral spirits followed by a detergent solution.

The method used to remove the residual waste material from the tanks will depend on the physical properties and quantities of that material. Prior to any person entering the tank, an effort will be made to remove as much liquid and sediment as possible (see section 6.2.1).

Subsequent to vacuuming the majority of the material from the tanks, it may be necessary to use a high pressure wash system using clean solvent and a detergent solution to rinse residual material from the walls, roof, and floor of the tank. The evacuated material and the rinse solution will be shipped to a reclaimer. The quantity of wash fluid used will be kept to a minimum in order to limit the amount of waste material.

Storage tanks are considered confined spaces (i.e. spaces open or closed having a limited means of egress in which poisonous gases or

flammable vapors might accumulate or an oxygen deficiency might occur), and confined space entry requires special procedures:

a. Tanks are to be washed, neutralized and/or purged (where flammable atmosphere is present) prior to being entered.

b. Supply valves must be closed and tagged and bleeder valves left open; or supply piping should be disconnected.

c. Pumps or motors normally activated by automatic controls shall be operated manually to be sure they have been disconnected. Instrument power switches should be tagged "Off".

d. In tanks where flammable vapors may be present, all sources of ignition must be removed.

e. Under circumstances where "hot work" (welding, burning, grinding, etc.) is to be performed in or on the vessel, a test for combustible gases shall be taken. This is referred to as a "flash test". In all tank entering situations, an oxygen deficiency test shall also be performed prior to tank entry. Both flash test and oxygen deficiency test will be performed by the supervisor of the area in which the work is being done.

f. Under conditions where there exists a possibility (no matter how remote) of toxic vapors being present in the tank to be entered, the supervisor will arrange to have the air tested. The results of all tests will be displayed on site.

g. There must be a set of wristlets or a rescue harness and sufficient rope at the job site to effect a rescue. Any other rescue equipment considered necessary must also be on the job site.

h. Workers should wear rescue harnesses if entering a tank with a large enough opening to easily affect a rescue. In tanks with small openings, only wristlets may be used. In cases where there are agitator shafts, drums or other hazards in which the man's life-line would be entangled and the supervisor in charge feels that wearing the lifeline may entrap a man and increase the hazard, the wearing of a harness or wristlets may be eliminated.

i. A constant source of fresh air must be provided to insure a complete change of air every few minutes. In cases of short term entry for inspection or removal of objects, an air mask is recommended. In cases of long term entry the use of an air mover should be considered.

j. When a ladder is required to enter a tank, the ladder must be secured and not removed while anyone is in the vessel. In cases where a rigid ladder could become an obstacle, a chain ladder may be used.

k. Adequate illumination must be provided and a flashlight or other battery operated light must also be on hand to provide illumination for a safe exit in the event of an electrical power failure.

l. All electrical equipment to be used inside the tank must be in good repair and grounded.

m. Other people working in the immediate area will be informed of the work being done, and they must inform the watcher or supervisor immediately of any unusual occurrence which makes it necessary to evacuate the tank.

n. The Watcher or Standby Observer System must be implemented. It consists of the following:

(1). Workers inside a confined space must be under the constant observation of a fully instructed watcher.

(2). Before anyone enters the tank, the watcher will be instructed by the person in charge of the entry that an entry authorization must be obtained from the person in charge and a rescue harness or wristlets must be used on the job.

(3). The watcher must also know the location of the nearest telephone (with emergency numbers posted), eyewash and/or shower, fire extinguisher and oxygen inhalator. For all "hot work" inside a tank, the watcher must be instructed how to shut down the welding/burning equipment.

(4). As long as anyone is inside the vessel, the watcher must remain in continuous contact with the worker. HE IS NOT TO LEAVE THE JOB SITE EXCEPT TO REPORT AN EMERGENCY. He does not enter the tank until help is available.

(5). After being instructed in his responsibilities, the watcher will sign a form indicating his understanding.

o. All welding and burning equipment must be provided with a shutoff under the control of the watcher; and the watcher must be shown how to shut off the equipment if it becomes necessary. Welding and burning equipment will only be taken into a tank immediately prior to its use and must be removed from the tank immediately after the job is finished.

p. For all "hot work" inside a tank, a properly executed flame permit, if needed, must be displayed at the job site and standard welding and burning safety precautions will always be followed.

6.2.3 Removal of the Tank

To safely remove the tank :

a. Disconnect all appurtenant piping.

b. Disconnect all appurtenant pumping equipment.

c. The tanks and piping shall be removed and disposed of at a properly permitted landfill. The final rinsate must be sampled and analyzed for volatile organic compounds to determine the cleanliness of the tank and its piping. If any volatile organic compounds are present above detection limits, the washing and rinsing must be repeated until they are no longer detectable.

d. Sample and analyze for mineral spirits and TCLP contaminants (except pesticides) beneath the tank farm. If contamination is indicated, it will be confirmed with an extent of contamination soil study. The soil will be overexcavated or otherwise

treated to eliminate the contamination. Soil samples must be collected and analyzed after clean-up to insure decontamination has been achieved.

e. Backfill the excavation with clean fill materials and grade to ground level.

f. Repave with asphalt or concrete as needed.

g. Wastes (such as contaminated soil, rinsate and tank pieces) generated during the cleanup are hazardous unless it can be demonstrated they are not.

Closure documentation must include proof that these wastes were disposed of at a properly permitted facility, analyses of the waste, quantities and the disposal location.

6.3 DRUM STORAGE AREAS IN WAREHOUSE

The drum storage areas are used for the storage of drums of used immersion cleaner, dry cleaning waste and dumpster sediment. At closure, all the drums will be removed and transported to a reclaimer after proper packaging, labeling and manifesting. The contents of the drums will be reclaimed and the drums will be cleaned for reuse.

The concrete floor and spill containment sumps will be cleaned with a detergent solution and the final rinsate will be analyzed for volatile organic compounds to determine the effectiveness of the cleaning. If any cracks are present soil samples must be collected from beneath the cracks ad analyzed for volatile organic compounds. If contamination is present, a workplan must be developed to determine the extent of contamination and proper remedial action. Any other wastes generated in the closure process will be reclaimed or properly disposed of.

6.4 SOLVENT RETURN AND FILL STATION

The return and fill station is used to collect and return the used mineral spirits to the waste storage tank. Closure of the return and fill station will be made prior to the cleaning and removal of the storage tank. At closure, the sediment in the dumpsters will be removed and drummed, labeled, and manifested for proper treatment and disposal at a Safety-Kleen recycle center.

The dumpster and the dock area will be thoroughly rinsed with a detergent solution. The rinsate is discharged through the appurtenant piping system into the storage tank (after it has been emptied but before disconnection), which will be subjected to a separate closure procedure as described earlier. The final rinsate must be analyzed for volatile organic compounds. The washing and rinsing will be repeated until contaminants are not present above detection levels. The clean dumpster and dock structure will be reused by Safety-Kleen or scrapped.

6.5 IGNITABLE WASTE SHELTER

The ignitable waste shelter is used to store containers of paint waste and dumpster sediment prior to shipment to a reclaimer. At closure, any residual waste will be removed from the shelter and shipped to a reclaimer. The shelter will be thoroughly cleaned with a detergent solution and the rinsate will be collected and properly disposed of. The metal structure will be reused by Safety-Kleen or scrapped.

6.6 FACILITY CLOSURE SCHEDULE AND CERTIFICATION

Within 90 days of receiving the final volume of hazardous wastes, Safety-Kleen will remove all hazardous wastes from the site in accordance with the approved closure plan. The New Mexico Health and Environment Department may approve a longer period if Safety-Kleen demonstrates that the activities required to comply with this paragraph will, of necessity, take longer than 90 days to complete or the following requirements are met:

a. the facility has the capacity to receive additional wastes;

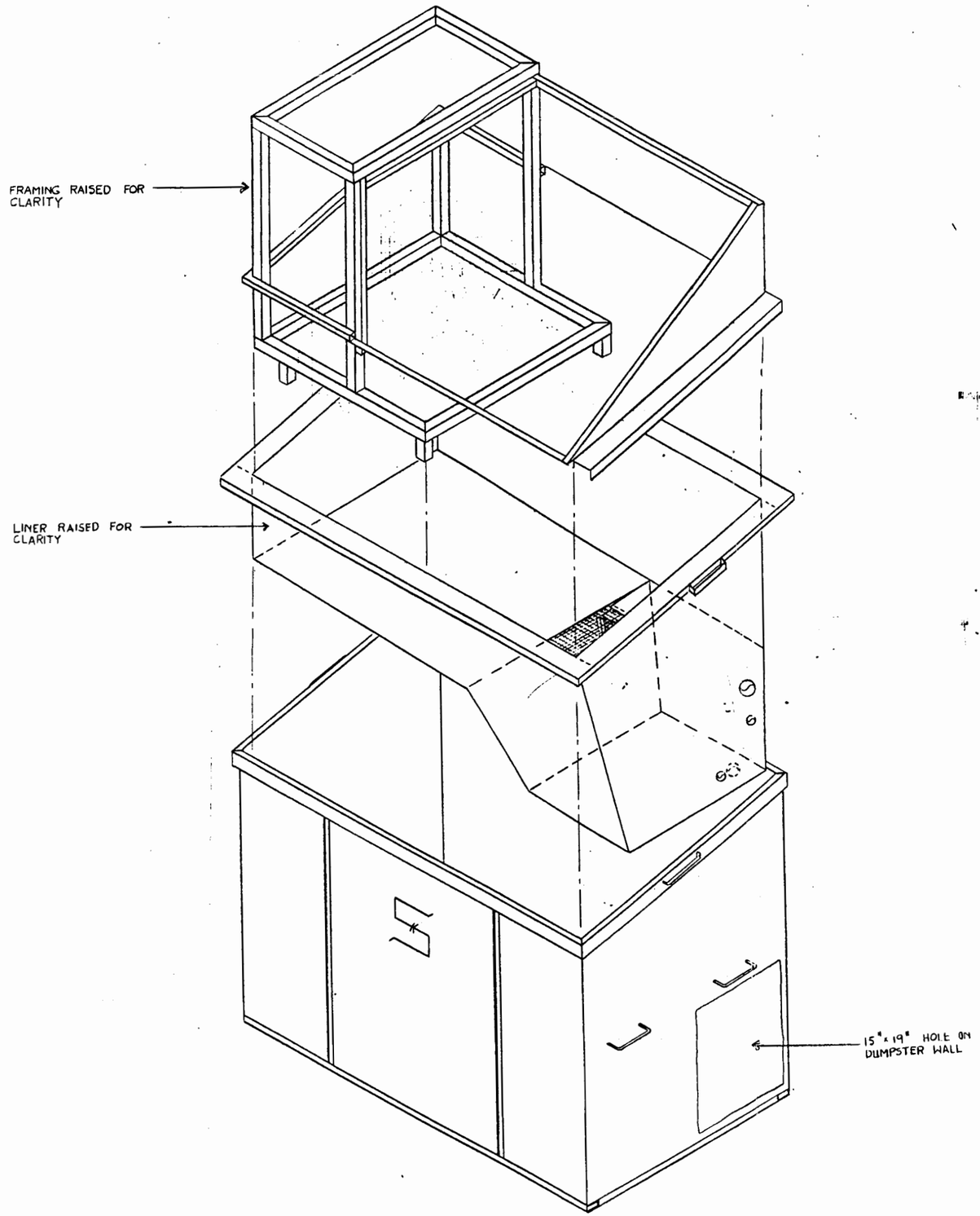
b. there is a likelihood that a person other than Safety-Kleen will recommence operation of the site; and/or

c. closure of the facility is incompatible with continued operation of the site. In this case, Safety-Kleen will take all steps necessary to prevent threats to human health and the environment.

Safety-Kleen will complete closure activities in accordance with the approved closure plan and within 180 days after receiving the final volume of wastes.

When closure is completed, Safety-Kleen shall submit to the New Mexico Health and Environment Department certification, both by the operator and by an independent registered professional engineer, that the facility has been closed in accordance with the approved closure plan.

APPENDIX C
MAPS AND FACILITY DRAWINGS



PRELIMINARY

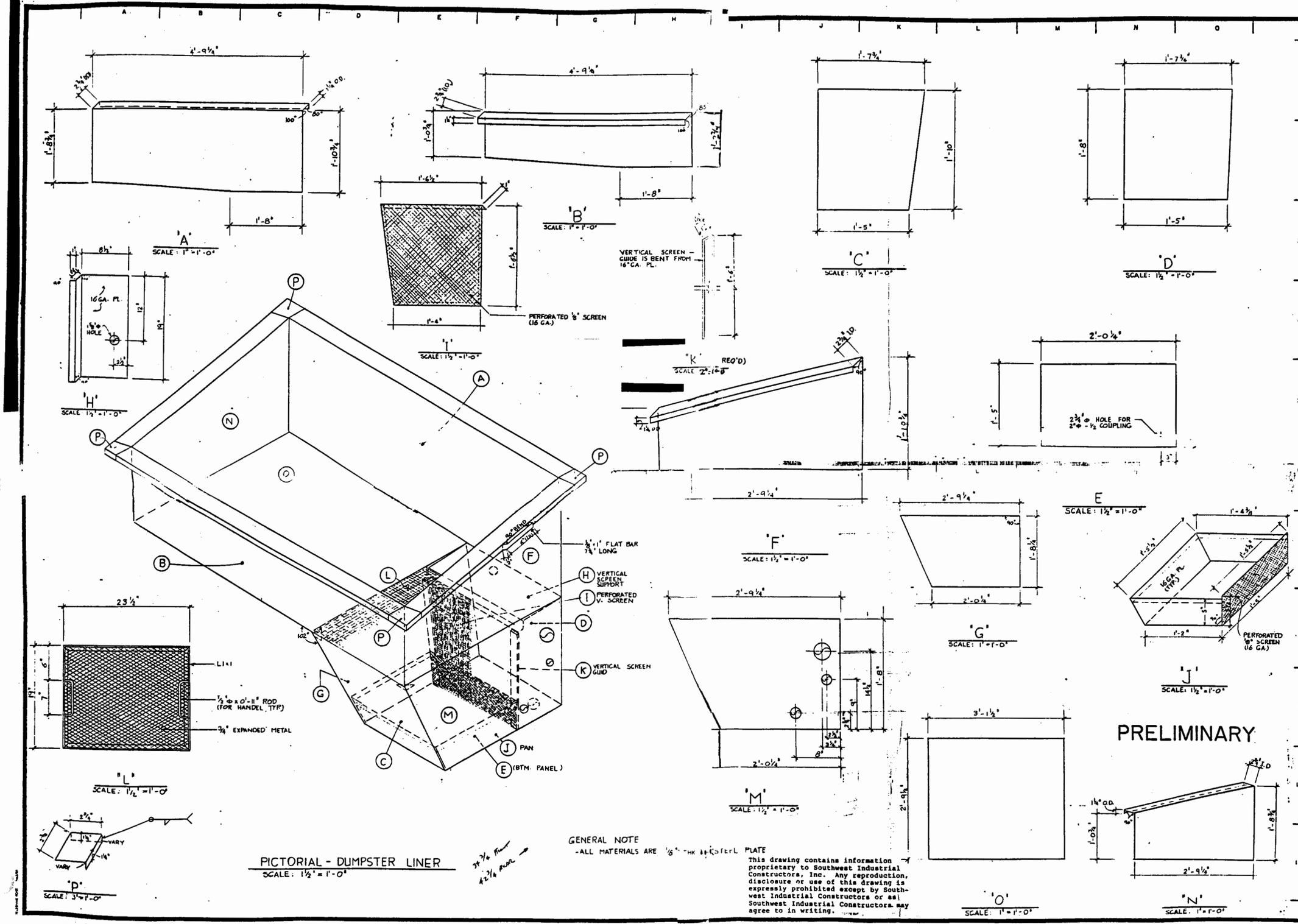
This drawing contains information proprietary to Southwest Industrial Constructors, Inc. Any reproduction, disclosure or use of this drawing is expressly prohibited except by Southwest Industrial Constructors or as Southwest Industrial Constructors may agree to in writing.

SOUTHWEST INDUSTRIAL CONSTRUCTORS,
DESIGNERS & BUILDERS - GENERAL CONTRACTORS - INDUSTRIAL CONSTRUCTION - SPECIALTY CO
121 Exposition • Denton, Texas 76205 • 817-

DATE: 12-18-89
JOB NO:
DWN: AL
CHK:

SAFETY - KLEEN DRUM WASHER

SHEET NO. 1 OF



PICTORIAL - DUMPSTER LINER
SCALE: 1½" = 1'-0"

GENERAL NOTE
-ALL MATERIALS ARE ⅛" THK STEEL PLATE

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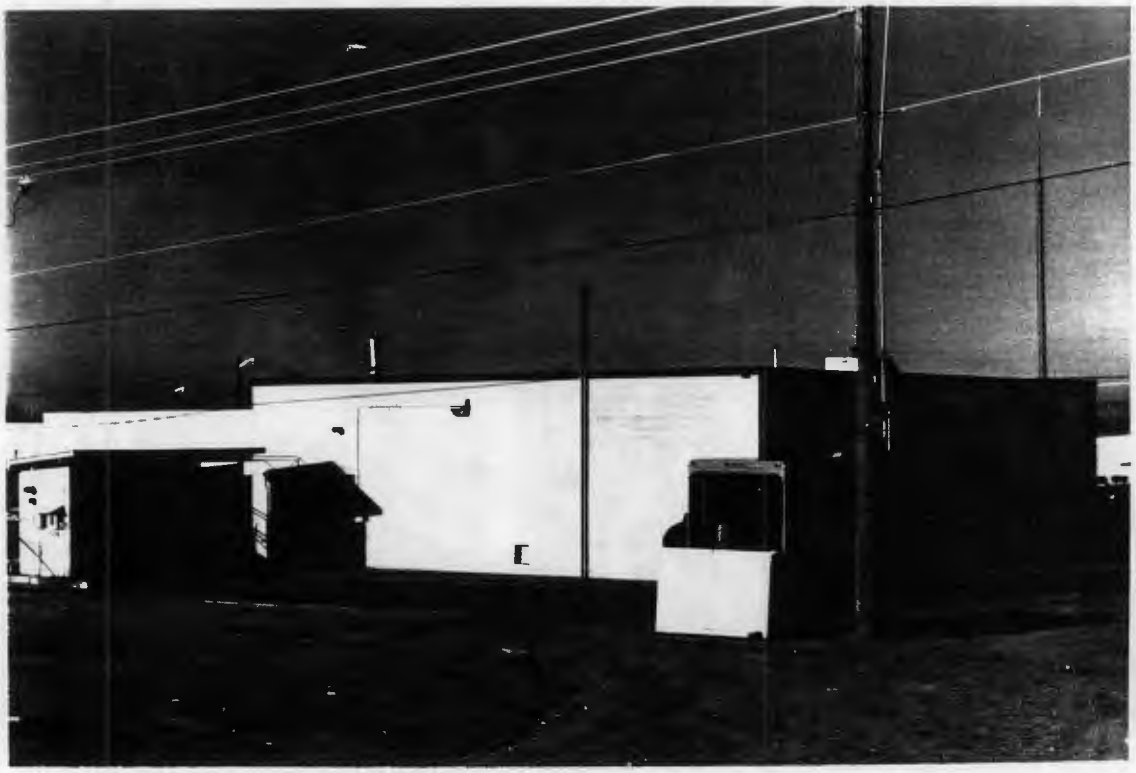
SOUTHWEST INDUSTRIAL CONSTRUCTORS, INC.
DESIGN-BUILD DIV. PLANT ENGINEERING, INDUSTRIAL CONSTRUCTION, SPECIALTY CONSTRUCTION, CONSTRUCTION MANAGERS
101 Farmington • Denton Texas 76205 • (817) 566-1899

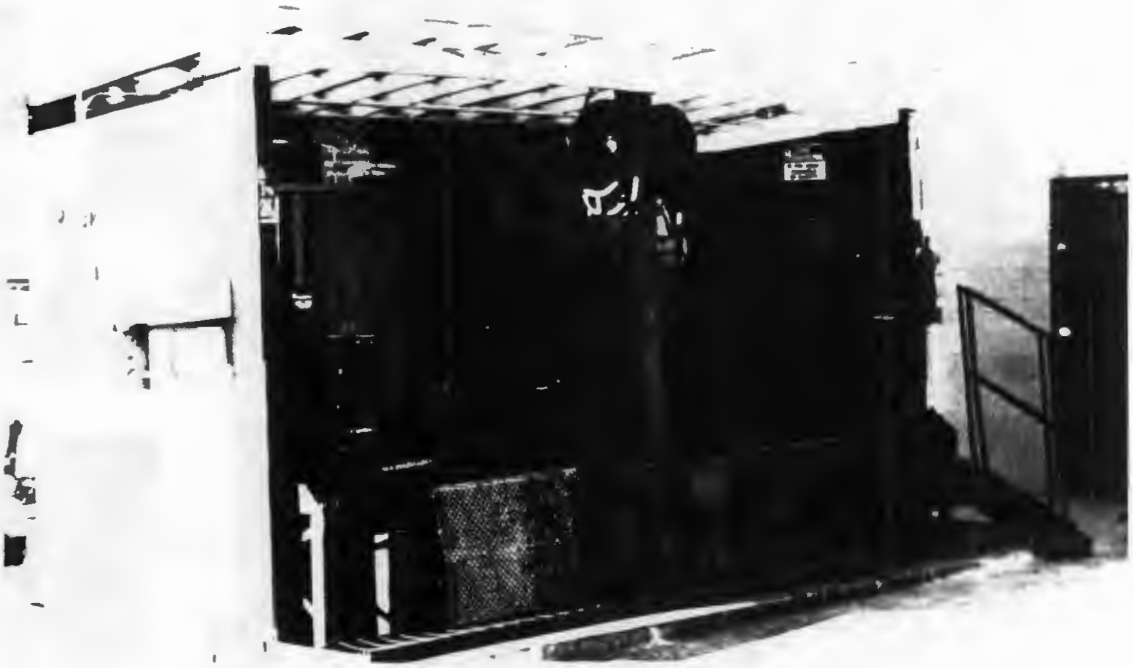
DATE 11/6/89
JOB NO:
DWN: ALI
CHK:

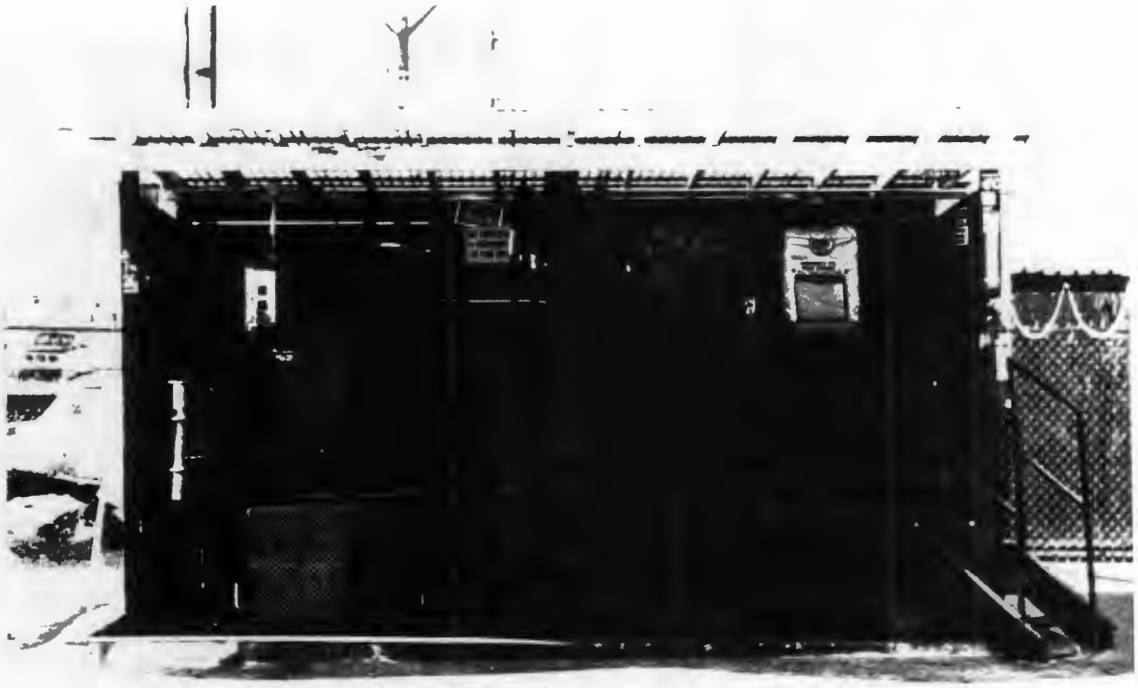
SAFETY - KLEEN DRUM WASHER

SHEET NO. 2

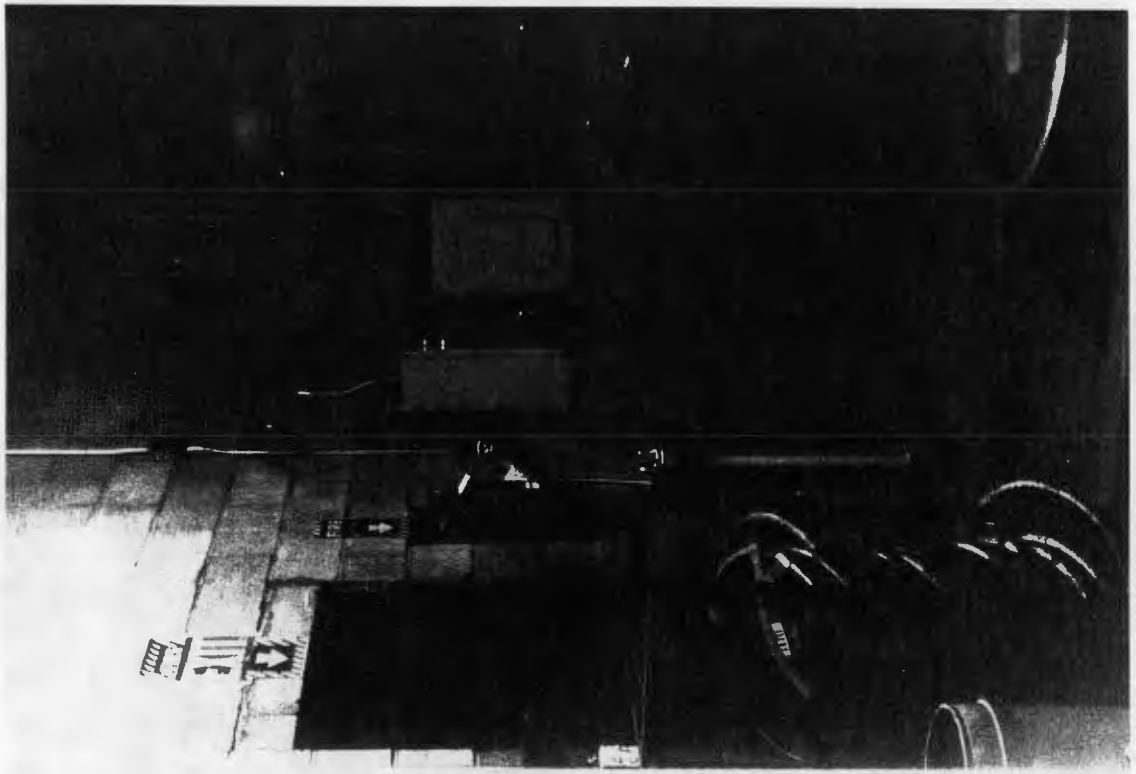
Photographs, Albequerque, New Mexico Service Center







SPILL
RESPONSE



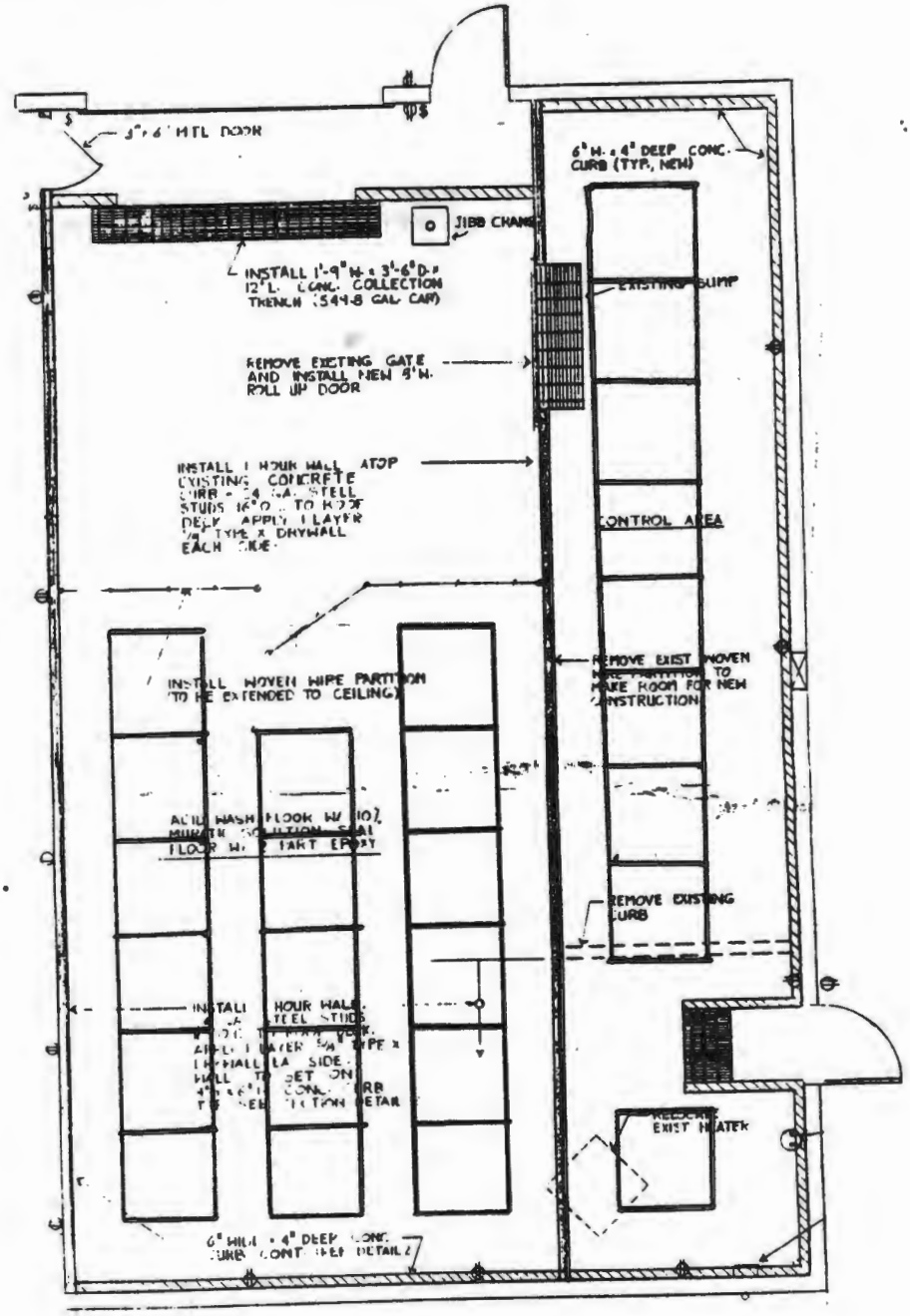
SAFETY-KLEEN CORP.

Albuquerque, NM

Scale:
1" = 8'

North

Spent immersion cleaner(F002, F004) and dry cleaner wastes (F002) will be stored in these areas in 16-, 20- and 30-gallon drums.

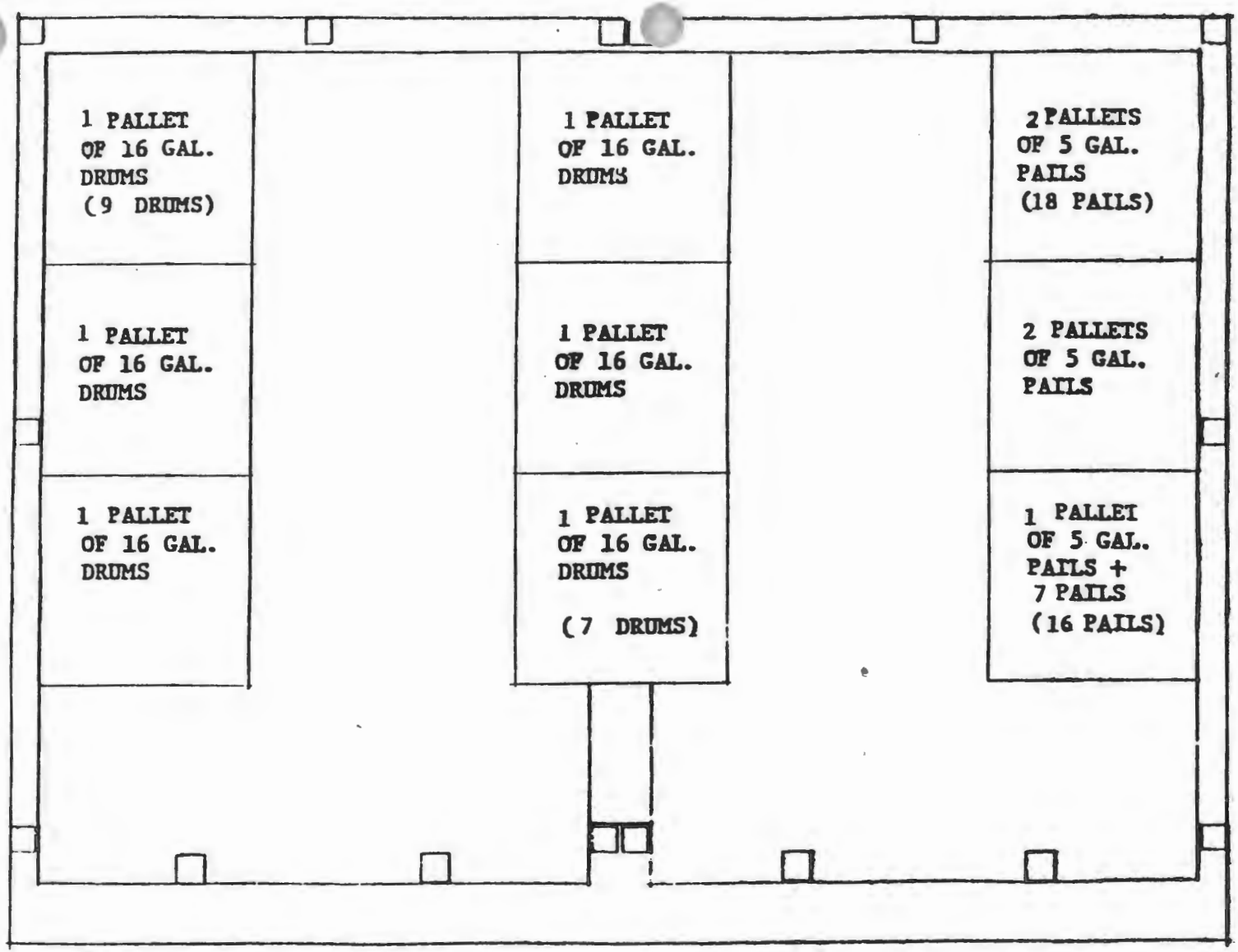


CONTAINER STORAGE AREAS:

West Container Storage Area - Secondary containment is in the form of a 12'L x 1'9"W x 3'6"D collection trench (x 7.48 gallons/cubic foot = 549.8 gallons) The volume stored in this area will be 24 single- and double stacked pallets holding 9 16-gallon drums each (3,456 gallons) or the equivalent volume in different sized containers, none larger than 30 gallons.

East Container Storage Area - Secondary containment is in the form of a 12'L x 2'W x 2'6"D collection trench (x 7.48 gallons/cubic foot = 448.8 gallons) The volume stored in this area will be 18 double-stacked pallets holding nine 16-gallon drums each (2,592 gallons) or the equivalent volume in different sized containers, none larger than 30 gallons.

Two foot aisles must be maintained. Stacks of containers must not exceed six feet in height.



PAINT WASTE STORAGE
3/8" = 1'

5 pallets x 9 drums/pallet x 16 gal./dr.
+ 7 drums x 16 gal./dr. +
5 pallets x 9 pails/pallet x 5 gal./pail
+ 7 pails x 5 gal./pail
= 1,092 gallons total

APPENDIX D
ANALYTICAL DATA

VACUTECT™ TANK TESTING REPORT

S.O.# 4785

Customer: Safety Kleen Cust. Ref. # Date: 4-17-90

Billing Address: Phone: 214-526-3632

Service Address: 2720 Guard N.E. Albuquerque, N.M. Attention: Wayne Olson

TANK TEST											LINE		COMMENTS: Note alterations or repairs!
Tank # and Date Tested. See Diagram For Location. DATE/TANK #	TYPE PROD.	TANK DIA.	TANK GAL.	Dipped Water Level START	Dipped Prod. Level START	Rec. Water Level START	Water Ingress Detected At Computer Time HR/MIN	Bubble Ingress Detected At Computer Time HR/MIN	Ullage Air Ingress Detected At Computer Time HR/MIN	TIGHT (T) or FAIL (F)	TANK # LINE A,B,C	TIGHT (T) or FAIL (F)	TANKS and LINES TESTED TO CFR# 40, Parts 280-281 & NFPA 329 Specifications. Others: SUCTION (SS) or PRES. SYSTEM (PS) FIBERGLASS (FG) or STEEL (ST) LEAK DETECTORS Installed ? (LDI)
4-17 1	Mixt Spirits	96	12K	3/4	03	.50	0	0	0	T			No Line Test No Lines
4-17 2	Mixt Spirits	96	12K	0	68½	.14	0	0	0	T			No line test Remote Fill tested w/tank Tight

TANKNOLOGY SERVICE DIVISION: Houston TCI UNIT # 6

TANKNOLOGY CORPORATION INTERNATIONAL
5225 Hollister • Houston, TX 77040-6294
(713) 690-TANK • Fax: (713) 690-2255

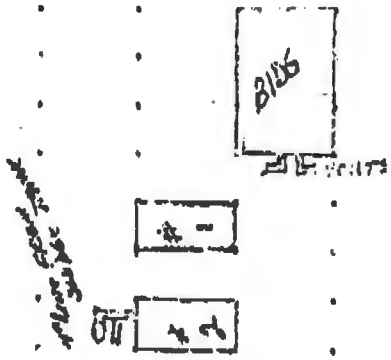
Original VacuTect data recordings are reviewed by Tanknology's Audit Control Department and maintained on file.

MONITOR WELLS

Number	1	2	3	4	5	6	7	8	9	10	11	12
Depth												
Water												
Prod. Detected												
NOT Det.												

NONE

Location Diagram



Parts and Labor used

General Comments

When local regulations require immediate reporting of a system leak Complete the following:

Reported to: _____

Name Date Time

Phone Number Regulatory Agency File Number

William S Fusek
Petut: Certified Testers Name

30
Vecutect(tm) Certification Number

William S Fusek
Certified Testers Signature

4-12-90
Date Testing Completed

Form:TestData 1/89

Sampling Devices

Each waste stream sample was collected with a new/dedicated thief sampler, or hand-held ladle. Forceps were used to sample filter material. In some cases sampling devices were custom made, using clean PVC conduit, glass or plastic containers, rigid steel wire, and duct tape. The samplers were either discarded after each use or decontaminated by washing with a biodegradable solution and rinsed with tap water in order to prevent cross-contamination of waste stream samples.

Sample Handling

The waste stream samples were immediately transferred to containers provided by Continental Analytical Services, Inc., Salina, Kansas. Each sample was appropriately labeled and packed on ice in an opaque cooler. Chain-of-custody/sample-analysis-request forms accompanied the samples to the laboratory. The sample coolers were secured and shipped to the laboratory via the regional bus service.

TABLE D-1

PARAMETERS AND RATIONALE
FOR HAZARDOUS WASTE ANALYSES

Hazardous Waste	Parameter	Rationale
Used Mineral Spirits	Flash Point TCLP Analysis	Ignitable characteristic (D001). Lead content may be greater than TCLP regulations.
Mineral Spirits Tank Bottom Sediment and Free Water	Flash Point TCLP Analysis	The sediment has a flash point of less then 140° F (D001) and the sediment and free water may contain Cadmium and Lead at levels greater than TCLP regulations.
Mineral Spirits Dumpster Sediment	Same as number 2.	Same as number 2.
Used Immersion Cleaner	Methylene Chloride Orthodichlorobenzene Cresylic Acid TCLP Analysis	Formula contains these ingredients: F002 and F004.
Dry Cleaning Wastes	Perchloroethylene TCLP Analysis	Contain this ingredient (F002).
Paint Waste	Toluene, xylene, methyl ethyl ketone, methyl iso butyl ketone, acetone isopropanol, methanol, ethanol, normal butyl acetate, iso butyl acetate TCLP Analysis	Contain these components: F003, and F005

TABLE D-2

PARAMETERS AND TEST METHODS

Parameter	Test Method	Reference
Flash Point	Tag closed cup tester	ASTM Standard D56-79
Boiling Range (to determine % water, mineral spirits and other solvents)	Dilstillation of Petroleum	ASTM Standard D-86-78
API Gravity	Hydrometer method	ASTM Standard D287-67
TCLP	TCLP Analysis	U.S. EPA Method, or an equivilant method.
Hydrocarbons and Volatile Organics	Gas Chromatograhpy (GC) Flame Ionization Detector (FID)	"Test Methods for Evaluation of Solid Waste, Physical/Chemical Methods", SW846, USEPA

TABLE D-3

METHODS USED TO SAMPLE HAZARDOUS WASTES

Hazardous Waste	Description of Sampling Method	Sampler	Reference for Sampling
Used Mineral Spirits	Sampling a tank "Samples & Sampling procedures for Hazardous Waste Streams" EPA-600/2-80-018	Test Methods for the Evaluation of Solid Waste Physical/Chemical Methods, SW846, U.S. EPA	Representative grab sample using a Coliwasa tube
Mineral Spirits Tank Bottom Sediment and free water	Same as number 1	Same as number 1	Same as number 1
Mineral Spirits Dumpster Sediment	Sampling a drum "Samplers & Sampling Procedures for Hazardous Waste Streams" EPA-600/2-80-018	Same as number 1	Representative composite sample using a Coliwasa tube
Used Immersion Cleaner	Same as number 3	Same as number 1	Same as number 3
Dry Cleaning Wastes	Same as number 3	Same as number 1	Same as number 3
Paint Waste	Same as number 3	Same as number 1	Same as number 3

TABLE D-4

FREQUENCY OF ANALYSIS

Hazardous Waste	Analysis	Frequency
Used Mineral Spirits	Flash Point TCLP Analysis	Annually or as required
Mineral Spirits Tank Bottom Sludge and Free Water	Flash Point TCLP Analysis	Annually or as required
Mineral Spirits Dumpster Mud	Flash Point TCLP Analysis	Annually or as required
Used Immersion Cleaner	Methylene Chloride Orthodichlorobenzene Cresylic Acid TCLP Analysis	Annually or as required
Dry Cleaning Wastes	Perchloroethylene TCLP Analysis	Annually or as required
Paint Wastes	Toluene, xylene, methyl ethyl ketone, methyl iso butyl ketone, acetone, isopropanol, methanol, ethanol,normal butyl acetate, cadmium, chromium, lead TCLP Analysis	Annually or as required

WASTE ANALYSIS PLAN

ANALYSES OF SPENT IMMERSION CLEANER

Sample Date	Sample ID	Sample Description	Cresylic Acid (mg/l)	1,2-Dichlorobenzene (mg/l)	Methylene Chloride (mg/l)
9-27-89	314 IC	Used Immersion Cleaner	13,000	3,300	9,700
9-29-89	315 IC	Used Immersion Cleaner	92,000	280,000	210,000
10-2-89	313 IC	Used Immersion Cleaner	94,000	276	10,000
12-27-89	314b IC	Used Immersion Cleaner	20,000	40,000	660,000
12-27-89	315b IC	Used Immersion Cleaner	21,000	39,000	390,000
1-23-90	SIC (ED)	Used Immersion Cleaner	210,000	360,000	100,000

WASTE ANALYSIS PLAN

ANALYSIS OF PAINT WASTE

Sample Date	Sample ID	Sample Description	Cd (mg/l)	Cr (mg/l)	Pb (mg/l)
10-2-89	313 PWT	Paint Waste Thinner	0.9	3.6	<2

WASTE ANALYSIS PLAN

ANALYSES OF SPENT MINERAL SPIRITS

DUMPSTER SEDIMENT

Sample Date	Sample ID	Sample Description	Fl. Pt. (°C)	Cd (mg/l)	Cr (mg/l)	Pb (mg/l)
9-27-89	314 DM	Wet Dumpster Mud, Mineral Spirits	40	0.30	1.1	8.9
9-29-89	315 DM	Wet Dumpster Mud, Mineral Spirits	45	1.51	0.08	1.2
10-2-89	314 DM	Wet Dumpster Mud, Mineral Spirits	42	0.43	<0.04	1.1

WASTE ANALYSIS PLAN

ANALYSES OF SPENT MINERAL SPIRITS

Sample Date	Sample ID	Sample Description	Fl. Pt. (°C)	Cd (mg/l)	Cr (mg/l)	Pb (mg/l)
9-27-89	314 SMS	Spent Mineral Spirits	42	0.38	< 0.04	1.1
9-29-89	315 SMS	Spent Mineral Spirits	38	2.1	0.8	15
10-2-89	313 SMS	Spent Mineral Spirits	40	0.8	< 0.4	10

WASTE ANALYSIS PLAN

ANALYSES OF TANK BOTTOM SEDIMENT

Sample Date	Sample ID	Sample Description	Fl. Pt. (^{o}C)	Cd (mg/l)	Cr (mg/l)	Pb (mg/l)
9-27-89	314 TB	Mineral Spirits Tank Bottom Sediment	37	0.22	<0.04	0.9
9-29-89	315 TB	Mineral Spirits Tank Bottom Sediment	45	0.66	<0.04	0.7

WASTE ANALYSIS PLAN

ANALYSES OF DRY CLEANER WASTES

Sample Date	Sample ID	Sample Description	Flash Point (°C)	Perchloro-ethylene (mg/L)	Mineral Spirits (mg/L)
9-29-89	315 SP	Dry cleaning wastes PCE	--	420,000	--
1-23-90	331 SB	Dry cleaning wastes PCE still bottoms	--	330,000	--
1-23-90	331 FP	Dry cleaning wastes PCE filter powder	--	15,000	--
1-23-90	331 F	Dry cleaning wastes PCE cartridge filter material	--	390,000	--
1-23-90	331 MSSB	Mineral spirits dry cleaning waste still bottom	48	--	710,000
2-8-90	331 MSFP	Mineral spirits dry cleaning waste filter powder	38	--	860,000
1-23-90	331 MSF	Mineral spirits, dry cleaning waste cartridge filter material	34	--	440,000

Example of a manifest with Land Ban Notification

SAFETY-KLEEN CORP. STATE PRESCRIBED FORM P.O. BOX 19276 SPRINGFIELD, ILLINOIS 62794-9276 (217) 782-6787 State Form LPC 62 8/81 IL532-0610

5-034-53

NOTE: FORM DESIGNED TO PRINT 6 LINES PER INCH

EPA Form 8700-22 (6-89) Form Approved. OMB No. 2050-0039 Expires 9-30-91

FORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: ILD 981997210 | Manifest Document No.: 39888 | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law, but is required by Illinois law.

3. Generator's Name and Mailing Address: CONTINENTAL 3135 N CLYBOURN CHICAGO IL 60618-6424 | Location if Different:

A. Illinois Manifest Discharge Permit: IL 5072348 MANIFEST FEE PAID

B. Illinois Generator's ID: 0316813010

4. Generator's Phone: 708 000-0000

5. Transporter 1 Company Name: SAFETY-KLEEN CORP. | 6. US EPA ID Number: ILD 051060408

C. Illinois Transporter's ID: 1123

D. (708) 392-3880 Transporter's Phone

7. Transporter 2 Company Name | 8. US EPA ID Number

E. Illinois Transporter's ID

F. ( ) Transporter's Phone

9. Designated Facility Name and Site Address: SAFETY-KLEEN CORP. 306 CAMPUS DR ARLINGTON HGTS, IL 60004 | 10. US EPA ID Number: 5-034-53 ILD 000805929

G. Illinois Facility's ID: 0310090005

H. Facility's Phone: 708 392-3880

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ WASTE PERCHLOROETHYLENE ORM-A NA1897 (F002)(ERG #74)	005	DM	00035	1	EPA HW Number X X F002; Authorization Number 000003
b.					EPA HW Number X X; Authorization Number
c.					EPA HW Number X X; Authorization Number
					EPA HW Number; Authorization Number

NOTICE: IN ACCORDANCE WITH 40 CFR 268.7, THE GENERATOR PROVIDES NOTICE THAT THE WASTE DESCRIBED AS 'WASTE PERCHLOROETHYLENE' IS A RESTRICTED WASTE. THE WASTE CONTAINS THE FOLLOWING CONSTITUENT WHOSE TREATMENT STANDARD IS NOTED: TETRACHLOROETHYLENE(0.05 PPM).

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above in Item #14: 1 = Gallons 2 = Cubic Yards

15. Special Handling Instructions and Additional Information: 9029 17553488 139888 5-034-53-2067 01

EMERGENCY RESP#1-708-888-4660

SKDOT# A: 506 B: C: D:

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: T. L. HANG | Signature | Date: Month 07 Day 13 Year 90

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: DEAN HOWARD | Signature | Date: Month 07 Day 13 Year 90

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date: Month Day Year

Discrepancy Indication Space

19. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name: JERRELL HAYNICK | Signature | Date: Month 07 Day 13 Year

This Agency is authorized to require, pursuant to Illinois Revised Statutes, Chapter 111½, Section 21, that this information be submitted to the Agency. Failure to provide the information may result in a civil penalty against the owner or operator of not to exceed $25,000 per day of violation. Falsification of this information may result in a fine up to $50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center

GENERATOR

TRANSPORTER

FACILITY

If a spill call the Illinois Office of Emergency Response at 217/782-7637 and the National Response Center at 800/424-8802 or 202/426-2675.

COPY 4. TRANSPORTER 1 COPY

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

TO: Safety-Kleen Corp. (Designated Facility) EPA ID NO.: _____ (Designated Facility)

_____ (Address)

Option A: Under manifest number _____, of sales/service acknowledgement number _____, the generator noted below is shipping to you a waste determined to be restricted under 40 CFR Part 268. In accordance with 40 CFR 268.7, the generator hereby provides notice that the waste is restricted from land disposal. A copy of this form must be kept by the generator and facility for five (5) years from the date of waste shipment.

Option B: I am a small quantity generator (100-1,000 kg/mo). This notice covers all wastes shipped under the following Machine Placement and/or Customer Owned Machine Service (CMS) Contract(s): _____ A copy of this notice will be filed with the contract(s) for five (5) years beyond their termination.

(Check boxes that apply) Waste Name	EPA Waste Code	The Waste May Contain the following Restricted Constituents	Treatment Standard (mg/l) or Method
☐ Waste Petroleum Naphtha	0001	Ignitable liquid	incineration, fuel substitutions or recovery.
		Halogenated organic compounds (above 1000 mg/l) may include:	See individual standards per 40 CFR 268.41(a)
		-Methylene chloride	0.96
		-Tetrachloroethylene	0.05
		-Toluene	0.33
		-1.1.1 trichloroethane	0.41
		-Trichloroethylene	0.091
		-Xylene	0.15
☐ Waste Petroleum Naphtha (sludges from Safety-Kleen Service Center Operations)	0001, 0006, 0008	All of the above, plus: -Cadmium	0.14
		-Lead (low lead subcategory)	0.51
☐ Waste Compound Cleaning Liquid/ Immersion Cleaner	F002, F004	Cresylic Acid	0.75
		1,2-dichlorobenzene	0.125
		Methylene choloride	0.96
☐ Waste Perchloro-ethylene	F002	Tetrachloroethylene	0.05
☐ Waste Trichloro-trifluoroethane	F002	Trichlorotrifluoroethane	0.96
☐ Waste Trichloro-ethane	F002	Trichloroethane	0.41
☐ Waste Paint Related Material	F005, F003, 0001, 0006, 0008	Acetone	0.59
		Methyl Ethyl Ketone	0.75
		Methyl Isobutyl Ketone	0.33
		Toluene	0.33
		Xylene	0.15
		Cadmium	0.14
		Chromium	0.094
		Lead (low-lead subcategory)	0.51
		Ignitable liquid	incineration, fuel substitution or recovery

---

The constituent composition is based on knowledge of the waste (via Material Safety Data Sheets for the chemical(s) used, and the process which created the waste).

Generator Name: _____ EPA ID#: _____

Generator Signature: _____ Date: _____

Printed Name and Title of Representative: _____

Safety-Kleen Corp. manages the above wastes through its recycling and fuels

2.2.4 RECEIPT ANALYSIS - "CLOSED LOOP" AND "INDUSTRY SPECIFIC" WASTES

This subsection outlines the analysis to which the waste solvents from the various Safety-Kleen Corp. businesses are subjected for receipt control. The receipt control logic is summarized in flow charts and discussed below for each major type of solvent. Solvents received from "closed loop sources" include parts washer solvent, immersion cleaner solvent, gun cleaner solvent and other similar solvents. Solvents received from "industry specific sources" include such solvents as dry cleaner solvent and used oil.

2.2.4.1 PARTS WASHER SOLVENT

The Parts Washer Services is a "Closed Loop" service in which Safety-Kleen Corp. provides equipment and a solvent exchange service. In these services, Safety-Kleen Corp. provides the equipment and clean solvent, takes back the spent solvent, recycles the solvent and returns the recycled solvent back to the service. Hence, the term "closed loop". Customers using this service include automobile dealers, auto repair shops, garages, fleet maintenance shops, manufacturers of automobiles, trucks, airplanes, heavy and light manufacturing equipment, and other businesses. The parts washer machine is used for a specific purpose, to clean and degrease parts, in specific locations and is serviced by a Safety-Kleen representative on a scheduled basis. Because of the integrity of this service and its uniform use, the contaminants, e.g. oil, grease, carbon deposits, in parts washer solvent are of a consistent nature. Analytical data is renewed and updated as material is received and processed.

Parts washer solvent is petroleum naphtha with a nominal flash point of 105°F. The boiling range of this petroleum fraction is typically 315-400°F. It is commonly referred to as "Mineral Spirits" or "Stoddard Solvent".

The predominance of waste parts washer solvent is received in bulk at the recycle centers. The remainder of the waste parts washer solvent is received in drums.

For bulk receipts, a sample is taken before unloading and sent to the laboratory for analysis. While analysis is underway, the material is unloaded into a settling tank where it is held until the analysis results are available. For receipts of containerized parts washer solvent, the drums are emptied into a vat and pumped into a dedicated mineral spirits settling tank. Settling tanks are used to isolate a batch of receipts and to begin the recovery process of separating emulsion, water and sediments. Bulk shipments and settling tank samples are both analyzed as follows:

Primary Tests:	Flashpoint - Verify greater than 90°F PCB Analysis
Secondary Tests:	Volatile Organic Analysis Physical Appearance Specific Gravity pH Bottoms Sediment and Water (BS&W) Distillation Performance

If the results of the analyses meet the acceptance criteria, the laboratory releases the material in the settling tank to be processed. The recovered parts washer solvent is returned to the Safety-Kleen Corp. service centers for reuse by Safety-Kleen Corp. customers.

If the particular acceptance criteria for parts washer solvent are not met, a determination will be made as to what processing technology is required. The material will then be processed accordingly.

2.2.4.2 IMMERSION CLEANER SOLVENT

The immersion cleaner service is another "Closed Loop" service. In these services, Safety-Kleen Corp. provides the equipment and clean solvent, takes back the spent solvent, recycles the solvent and returns the recycled solvent back to the service. Hence, the term "closed loop". The immersion cleaner solvent or carburetor and cold parts cleaner solvent is used mainly to clean carburetors and this is used by automobile dealers, auto repair shops, garages and fleet maintenance operations. The immersion cleaner machine is used for a specific purpose, in specific locations and is serviced by a Safety-Kleen representative on a scheduled basis. Because of the integrity of this service and its uniform use, the contaminants in immersion cleaner solvent are of a consistent nature. Analytical data is renewed and updated as material is received and processed.

The waste immersion cleaner is typically received in drums from the Safety-Kleen Corp. service centers. These containers are normally the 16-gallon steel drums used by the generator (customer). Upon receipt, each load of drums is kept together. The drums are emptied into a vat and pumped into a dedicated immersion cleaner settling tank. The settling tank isolates a batch of receipts.

If a bulk shipment of waste immersion cleaner is received from another Safety-Kleen Corp. recycle center, the bulk shipment is sampled before unloading. Bulk shipments and settling tank samples are both analyzed as follows:

Primary Tests:	Flash Point PCB Analysis
Secondary Tests:	Physical Appearance Specific Gravity pH % Water Distillation Performance Volatile Organic Analysis

The settling tank is released for processing if the analytical results meet the acceptance criteria. The recovered Immersion Cleaner is returned to the Safety-Kleen Corp. service centers for distribution and reuse by Safety-Kleen Corp. customers.

If the particular acceptance criteria for immersion cleaner solvent are not met, a determination will be made as to what processing technology is required. The material will then be processed accordingly, which may include transportation to another processing facility.

2.2.4.4 DRY CLEANER SOLVENT

The dry cleaner service provided by Safety-Kleen Corp. consists of a waste service for collection of dry cleaner still bottoms, filter cartridges, and filter media from filters used to purify the dry cleaning solvent during usage. From these wastes, Safety-Kleen Corp. recovers high purity perchloroethylene (tetrachloroethylene) via evaporation and fractional distillation. As part of the overall service, Safety-Kleen Corp. sells recycled perchloroethylene and new filters to the dry cleaners.

This is an "industry specific" service which is well characterized. The waste generated by the dry cleaning industry consists of waste solvent, still bottoms, filter cartridges and filter media. The solid residue which Safety-Kleen separates from the solvent is recycled and contains metal, paper, activated carbon and oils. The solvent-containing waste received from the dry cleaning industry is predominantly perchloroethylene (tetrachloroethylene). The typical volatile organic content is 80% perchloroethylene, 15% mineral spirits, and 5% more volatile solvents. Safety-Kleen Corp. annually services approximately 15,000 customers; collecting 40,000,000 pounds of dry cleaner wastes for processing. The data and characterization of this material acquired to date, provides adequate knowledge of the material to safely manage it.

Safety-Kleen Corp. confirms the Volatile Organic Analysis characterization of the waste material by sampling and analyzing an in-process sample of distillate after distillation. The crude distillate is further refined by fractional distillation to produce high quality solvent.

Primary Tests:	Physical Appearance Volatile Organic Analysis
Secondary Tests:	Specific Gravity pH PCB Analysis - GC (Residue Extract)

The recovered solvent, perchloroethylene, is sold by Safety-Kleen Corp. directly to the dry cleaning industry and other users of this solvent.

APPENDIX E
EQUIPMENT INFORMATION

EMERGENCY EQUIPMENT LIST

The following equipment shall be located in the locker room area and the supply checked weekly:

Gloves - The rubber or plastisol gloves sold by Safety-Kleen are to be used when handling the solvents. Several pairs of gloves are located in the spill response area. Two dozen gloves are kept in storage.

Safety Glasses or Face Mask - Whichever the worker prefers, is to be worn when loading or unloading the solvent. Several pairs of glasses are kept in the spill response area. One pair of glasses hangs on the loading dock area.

Plastic Aprons - Are available for the situations where a solvent may get on the worker's clothing. Two plastic aprons are located at the spill response area. Several are kept in storage. One apron is located at the loading dock.

Decontamination of all equipment is accomplished by washing with soap and water.

Eye Wash Stand---The eye wash is located centrally at the Service Center. The workers should try the stand and be familiar with its operation. The eye wash stand should be checked once a week for operation.

Showers---Should be checked periodically to ascertain that they are operational. Located in locker room area.

Ventilation---Any area that is closed and collects vapors should be avoided or equipped with proper fans to insure adequate ventilation.

Fire Extinguisher---The service center has four 10-pound ABC extinguishers, located at the points where solvents are transferred. An ABC extinguisher is a universal system used on paper, wood and electrical, as well as solvent fires. The extinguishers must be full and carry an inspection tag. The accepted extinguisher is available as S-K Part No. 4009.

Absorbent Material---An adequate supply (200 sheets, 2 bales) should be on hand to handle small spills. Located in the loading and unloading area and warehouse. S-K Part No. 8890. One bale is located at the spill response area, on the loading dock and the route trucks. Several bales of absorbant material is kept in storage.

Communication System--- Telephones are installed at all facilities, normally in in the branch office. An alarm which sounds a buzzer throughout the warehouse is located at the return and fill dock area in case assistance is needed.

High Level Over-flow alarm---Over-flow alarms are installed at all storage tanks. They are set to activate at 95% tank capacity and have both a horn and a flashing light alarm which can be manually tested.

INSPECTION LOG SHEET FOR: Daily Inspection of **STORAGE TANK SYSTEM**

INSPECTOR'S NAME/TITLE: _____

INSPECTOR'S SIGNATURE: _____

	MON	TUES	WED	THURS	FRI
DATE:(M/D/Y)	____	____	____	____	____
TIME:	____	____	____	____	____

STORAGE TANKS:
(TANKS MUST NEVER BE MORE THAN 95% FULL!)

Volume in Product Tank (in./gal.)					
Volume in Second Product Tank (in./gal.)					
Volume in Waste Tank (in./gal.)					
Volume in Second Waste Tank (in./gal.)					

Tank Exterior	A* N	A N	A N	A N	A N

If 'N', circle appropriate problem: rusty or loose anchoring, lack of grounding, wet spots, discoloration, leaks, distortion, other: _____

High Level Alarms	A N	A N	A N	A N	A N

If 'N', circle appropriate problem: malfunctioning "Power On" light, malfunctioning siren/strobe light, other: _____

Volume Gauges	A N	A N	A N	A N	A N

If 'N', circle appropriate problem: disconnected, sticking, condensation, other: _____

CONTAINMENT AREA (Tank Dike):

Bottom and Walls	A N	A N	A N	A N	A N

If 'N', circle appropriate problem: cracks, debris in dike, open drums in dike, ponding/wet spots/stains, deterioration, displacement, leaks, other: _____

Self-closing Drain Valve	A N	A N	A N	A N	A N

If 'N', circle appropriate problem: open, leaks, other: _____

Rigid Piping and Supports	A N	A N	A N	A N	A N

If 'N', circle appropriate problem: distortion, corrosion, paint failure, leaks, other: _____

OBSERVATIONS, COMMENTS, DATE AND NATURE OF ANY REPAIRS: _____

*A = ACCEPTABLE

N = NOT ACCEPTABLE

(IF AN ITEM IS NOT APPLICABLE, ENTER 'N/A' AFTER IT AND DRAW A LINE THROUGH THE 'ACCEPTABLE/NOT ACCEPTABLE' ROW)

Inspection log sheet for: Daily Inspection of DRUM STORAGE AREA - A log must be completed for each storage area.

DESCRIPTION OF AREA (e.g., metal shelter, northeast corner of warehouse, etc.): _____

PERMITTED STORAGE VOLUME: _____

INSPECTOR'S NAME/TITLE: _____

INSPECTOR'S SIGNATURE: _____

	MON	TUES	WED	THURS	FRI
DATE:(M/D/Y)					
TIME:					
CONTAINERS:					
Number/Volume* of M.S. Waste Drums:					
Number/Volume of I.C. Waste Drums:					
Number/Volume of Dry Cleaning Waste Drums:					
Number/Volume of Dry Cleaning Waste Boxes:					
Number/Volume of Paint Waste Drums:					
Number/Volume of Paint Waste Pails: +					
TOTAL VOLUME (IN GALLONS):					
	A**N	A N	A N	A N	A N

If 'N', circle appropriate problem: Total volume exceeds the amount for which the facility is permitted, other: _____

Condition of Drums/Boxes	A N	A N	A N	A N	A N

If 'N', circle appropriate problem: missing or loose lids, missing, incorrect or incomplete labels, rust, leaks, distortion, other: _____

Stacking/Placement/Aisle Space	A N	A N	A N	A N	A N

If 'N', circle appropriate problem: different from Part B Floor Plan, containers not on pallets, unstable stacks, other: _____

CONTAINMENT:

Curbing, Floor and Sump(s)	A N	A N	A N	A N	A N

If 'N', circle appropriate problem: ponding/wet spots, deterioration (cracks, gaps, etc.), displacement, leaks, other: _____

Loading/Unloading Area	A N	A N	A N	A N	A N

If 'N', circle appropriate problem: cracks, deterioration, ponding/wet spots, other: _____

OBSERVATIONS, COMMENTS, DATE AND NATURE OF ANY REPAIRS: _____

* To calculate total volumes, use the following: M.S., I.C., D.C. and paint waste drums hold 16 gallons; D.C. boxes hold 10 gallons and paint waste pails hold 5 gallons.

**A = ACCEPTABLE

N = NOT ACCEPTABLE

(IF AN ITEM IS NOT APPLICABLE, ENTER 'N/A' AFTER IT AND DRAW A LINE THROUGH THE 'ACCEPTABLE/NOT ACCEPTABLE' ROW)

INSPECTION LOG SHEET FOR: Daily Inspection of STORAGE TANK SYSTEM

INSPECTOR'S NAME/TITLE: _____

INSPECTOR'S SIGNATURE: _____

	MON	TUES	WED	THURS	FRI
TRANSFER PUMPS AND HOSES					
Pump Seals	A* N	A N	A N	A N	A N
If 'N', circle appropriate problem: leaks, other: _____					
Motors	A N	A N	A N	A N	A N
If 'N', circle appropriate problem: overheating, other: _____					
Fittings	A N	A N	A N	A N	A N
If 'N', circle appropriate problem: leaks, other: _____					
Valves	A N	A N	A N	A N	A N
If 'N', circle appropriate problem: leaks, sticking, other: _____					
Hose Connections and Fittings	A N	A N	A N	A N	A N
If 'N', circle appropriate problem: cracked, loose, leaks, other: _____					
Hose Body	A N	A N	A N	A N	A N
If 'N', circle appropriate problem: crushed, cracked, thin spots, leaks, other: _____					
RETURN AND FILL STATION					
Wet Dumpster	A N	A N	A N	A N	A N
If 'N', circle appropriate problem: excess sediment buildup, leaks, rust, split seams, distortion, deterioration, excess debris, other: _____					
Secondary Containment	A N	A N	A N	A N	A N
If 'N', circle appropriate problem: excess sediment/liquid, leaks, deterioration, distortion, excess debris, other: _____					
Loading/Unloading Area	A N	A N	A N	A N	A N
If 'N', circle appropriate problem: cracks, ponding/wet spots, deterioration, other: _____					

OBSERVATIONS, COMMENTS, DATE AND NATURE OF ANY REPAIRS: _____

*A = ACCEPTABLE

N = NOT ACCEPTABLE

(IF AN ITEM IS NOT APPLICABLE, ENTER 'N/A' AFTER IT AND DRAW A LINE THROUGH THE 'ACCEPTABLE/NOT ACCEPTABLE' ROW)

INSPECTION LOG SHEET FOR: Weekly Inspection of SAFETY AND EMERGENCY EQUIPMENT, SECURITY DEVICES AND MISCELLANEOUS EQUIPMENT

INSPECTOR'S NAME/TITLE: _____

INSPECTOR'S SIGNATURE: _____

DATE OF INSPECTION (Month/Day/Year): _____

TIME OF INSPECTION: _____

SAFETY AND EMERGENCY EQUIPMENT

Fire Extinguishers: A* N

If 'N', circle appropriate problem: overdue inspection, inadequately charged, inaccessible, other: _____

Eyewash and Shower: A N

If 'N', circle appropriate problem: disconnected malfunctioning valves, inadequate pressure, inaccessible, malfunctioning drain leaking, other: _____

First Aid Kit: A N

If 'N', circle appropriate problem: inadequate inventory, other: _____

Spill Cleanup Equipment: A N

If 'N', circle appropriate problem: inadequate supply of sorbent, towels and/or clay, inadequate supply of shovels, mops, empty drums, wet/dry vacuum, other: _____

Personal Protection Equipment: A N

If 'N', circle appropriate problem: inadequate supply of aprons, gloves, glasses, respirator, other: _____

SECURITY DEVICES:

Gates and Locks: A N

If 'N', circle appropriate problem: sticking, corrosion, lack of warning signs, fit, other: _____

Fence: A N

If 'N', circle appropriate problem: broken ties, corrosion, holes, distortion, other: _____

MISCELLANEOUS EQUIPMENT:

Dry Dumpster: A N

If 'N', circle appropriate problem: rust, corrosion, split seams, distortion, deterioration, excess debris, liquids in unit, other: _____

OBSERVATIONS, COMMENTS, DATE AND NATURE OF ANY REPAIRS: _____

_____

_____

_____

_____

_____

*A = ACCEPTABLE

N = NOT ACCEPTABLE

(IF AN ITEM IS NOT APPLICABLE, ENTER 'N/A' AFTER IT AND DRAW A LINE THROUGH THE 'ACCEPTABLE/NOT ACCEPTABLE' ROW)

APPENDIX G
TRAINING INFORMATION

NEW BRANCH MANAGER TRAINING

Program for Regional Engineer branch visit -

1. Review of Environmental Notebook/Part B Permit
   - Part A Application
   - Waste Analysis Plan
   - Contingency Plan
   - Financial Requirements
   - Training Plan
   - Transportation Licensing

2. Review of Transportation Licensing

3. Review of Environmental Compliance Guidance and Corporate Policy Manual

4. 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

6. 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
   - Familiarize Branch Manager with the emergency response procedures described in the contingency plan, emergency response equipment and emergency response systems.

7. Health and Safety
   - OSHA 200 Reporting
   - Hazard Communication Program

8. Review Branch Specific Manifesting Procedures and Customer ID # Compliance

Review of Past EID Inspections and Other Past Branch Compliance-related "History"

10. Environmental Training for Branch Personnel
    - Requirements for Content and Frequency
    - Conducting Training Sessions
    - Recordkeeping

11. Review New Mexico hazardous waste regulations

Notes to Regional Engineers:

- Be prepared with examples and extra copies of all forms in case the branch is missing them.
- Spend time at the beginning of visit reviewing Environmental files for potential missing information or problems.
- Use several short quizzes covering the major topics as a review and documentation of the training session. A training record form should also be completed.
- Provide copies of your recent memos concerning environmental compliance at the branch or in the state. Branch copies may be missing.
- Provide Safety-Kleen part numbers for equipment (sorbents, signs, etc.) that may be missing at the branch.

INTRODUCTORY AND

ANNUAL TRAINING TOPICS FOR FACILITY EMPLOYEES

A. Environmental Regulation Update

B. Part A Application

C. Waste Analysis Plan (including waste determination procedures as described in the waste analysis plan)

D. Preparedness and Prevention Plan (including proper waste handling techniques)

E. Contingency Plan and Emergency Procedure - all of Chapter 4 and Appendix F of the Part B permit application, including:

   a. Procedures for using, inspection, repairing, and replacing facility emergency response equipment must be reviewed.
   b. Communications or alarm systems.
   c. Response to fires or explosions.
   d. Response to groundwater contamination incidents.
   e. Shutdown of operations.

F. Training

G. Closure

H. Inspections

I. Manifesting

J. Spill Simulation and Spill Reports

NOTE: **EMPLOYEES MAY NOT WORK IN UNSUPERVISED POSITIONS UNTIL THEY HAVE BEEN TRAINED. EMPLOYEES MUST BE COMPLETELY TRAINED, IN ALL THE ITEMS LISTED ABOVE, WITHIN SIX MONTHS OF STARTING AND ANNUALLY THEREAFTER.**

EHS TRAINING TOPIC LOG

Employee Name and No.: _____

Facility Location and No. _____

Date Hired: _____ Position: _____

NOTE: **EMPLOYEES MAY NOT WORK IN UNSUPERVISED POSITIONS UNTIL THEY HAVE RECEIVED EMERGENCY RESPONSE TRAINING. EMPLOYEES MUST BE COMPLETELY TRAINED, WITHIN SIX MONTHS OF STARTING AND ANNUALLY THEREAFTER.**

Certification by the employee that training has been received obligates the employee to discharge his duties in accordance with the training provided. Failure to comply with the requirements established during the training program may result in civil or criminal penalties against the employee.

TRAINING TOPIC*	DATE COMPLETED	SIGNATURE
1. _____		
_____	_____	_____
2. _____		
_____	_____	_____
3. _____		
_____	_____	_____
4. _____		
_____	_____	_____
5. _____		
_____	_____	_____
6. _____		
_____	_____	_____

* The training topic and training method should be described thoroughly. For example: "Safety Training Part III - Preventing Injuries and Illnesses (Videotape)", "Respirator Fit Testing and Training (written weekly training topic)", "Contingency Plan in Part B (reviewed with regional environmental engineer)", etc.

TRAINING PLAN OUTLINE

FOR

BRANCH EMPLOYEES

I. Purpose of Training and a Review of the Training Plan Outline

II. Environmental Regulations and Customer Responsibilities

- a. Small Quantity Generator vs. Generator
- b. Manifesting - How to Complete and Distribute a Manifest
- c. EPA Identification Numbers

III. Transportation Regulations

- a. Permits
- b. Vehicle Inspections and Records

IV. Waste Analysis Plan - Analyzing Incoming Shipments

V. Preparedness and Prevention Plan

- a. Performing and Recording a Facility Inspection
- b. Proper Maintenance of Storage Facilities and Associated Equipment
- c. Emergency Equipment - Availability and Use

VI. Contingency Plan

- a. Implementation of the Contingency Plan - Personnel and Emergency Functions
  - 1. Spills and Fires and Proper Response Actions
    - a. On Site Accidents
    - b. Transportation Accidents
  - 2. Reporting Requirements
    - a. Safety-Kleen Corp.
    - b. State Emergency Response System
    - c. National Response Center
- b. Emergency Information
- c. Corporate Policies 600-608, 609 and 610
  - 1. Review of Material Safety Data Sheets
- d. Recordkeeping - Spill Report Telephone Log

TRAINING PLAN OUTLINE

ANNUAL ENVIRONMENTAL COMPLIANCE COURSE
FOR REGIONAL MANAGERS, BRANCH MANAGERS AND SECRETARIES

I. Opening Remarks

II. Environmental Laws - National

A. Introduction

B. The National Environmental Policy Act (NEPA)

1. Purpose

2. Procedure: The Environmental Impact Statement

C. The Clean Air Act (CAA)

1. Purpose

2. How the Act Works

D. The Clean Water Act (CWA)

1. Purpose

2. Effluent Limitations for Direct Discharges

3. Pretreatment Standards for Indirect Discharges to Publically Owned Treatment Works (POTW)

4. Permit Program

E. The Resource, Conservation and Recovery Act (RCRA)

1. Purpose

F. The Toxic Substances Control Act (TSCA)

1. Purpose

2. How TSCA Works

G. The Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA" or "Superfund")

1. Purpose

2. Superfund clean-up

III. Resource, Conservation and Recovery Act (RCRA)

A. Overview and Scope

B. Hazardous Waste Management

1. Implementation

2. Identification and Listing of Hazardous Waste

a. Listed Wastes

b. Characteristic Wastes

c. Waste Mixtures

3. Generator Regulation

a. General requirements

b. Generator categories: 100-1000 kg./mo. generators

4. Transporter Regulation

a. General requirements

b. Discharges of hazardous waste during transportation

5. Treatment, Storage or Disposal Facility Regulation

a. General requirements

b. Interim status facilities

c. Permitted facilities

6. Enforcement

a. Inspections

b. Compliance Orders

c. Criminal Violations

d. Knowing Endangerment

e. Enforcement activity

C. New RCRA Programs

1. Leaking Underground Storage Tanks

a. The requirements

b. New Tank Ban

c. Notifications

IV. Facility Operation: Interim Status

A. Part A Application

B. Waste Analysis Plan

C. Preparedness and Prevention Plan

D. Contingency Plan and Emergency Procedure

E. Training

F. Closure

G. Inspections

H. Transportation Licensing

V. Manifesting

A. Overview

B Manifesting: Branch-Specific Instruction

VI. Certification Examination

VII. Sales Application of Environmental Compliance

VIII. Adjourn

safety-kleen®

PROCEDURES FOR UNLOADING AND RELOADING TANKERS

1. Secure the tractor-trailer for unloading or loading in a location which has easy access to the pump or curb side of the unit. Set brakes, engage governor and hook up grounding equipment.

2. Check available tank volumes via gauges or measure with a stick to verify that there is enough volume to transfer each load safely and prevent overfills. Leave all hatches open on storage tanks and on the tanker truck.

3. Make hose connections between storage tank and tanker truck in proper sequence (i.e., to empty vessel first). Double check to insure all connections are tight and locked.

4. Engage pump and move clean product to storage tank. Check for leaks along hose, piping and at connections. If a leak is noted, stop the operation immediately and make repairs or make arrangements for repairs.

5. Check the available tanker truck volume. Reverse hose connections and move dirty solvent from storage to tanker truck. (Again, check for leaks and repair as needed).

6. Drain all hoses before disconnecting to prevent spillage.

7. In the event of a spill, follow the emergency procedures outlined in the Contingency Plan.

8. Check all paperwork; document proper quantities of material delivered and picked up. Insure all manifests, bills of lading and other related paperwork are in order.

F2677-RV1

777 BIG TIMBER ROAD ELGIN, ILLINOIS 60123 PHONE 312/697-8460 TELEX 910 251 4479

RECORD OF PERSONNEL TRAINING

Certification by the employee that training has been received obligates the employee to discharge his duties in accordance with the training provided. Failure to comply with the requirements established during the training program may result in civil or criminal penalties against the employee.

DATE	DESCRIPTION OF TRAINING	JOB TITLE	EMPLOYEE NAME	EMPLOYEE SIGNATURE

JOB DESCRIPTIONS

BRANCH MANAGER

JOB DESCRIPTION

The Branch Manager has overall responsibility for the facility operations and maintenance, and directs sales activities within a certain geographic area defined by the Corporate Marketing Department. He is responsible for the proper operations and profitability of the service center.

REPORTS TO:

Regional Manager of Sales

QUALIFICATION:

Minimum high school graduate with Safety-Kleen sales experience.

PRINCIPAL RESPONSIBILITIES:

1. Plan, direct, and monitor activities of Sales Representatives.

2. Training of branch facility managers, sales representatives, and other branch personnel.

3. Assist or accompany sales representatives during their sales activities, when necessary.

4. Tabulate daily sales and inventory figures and report them to the corporate offices.

5. Maintain adequate inventory of solvents, allied products, and equipment.

6. Carry out corporate policies and standards regarding facilities, equipment operation and maintenance.

7. Insure the regular inspection of the facility and equipment, and the implementation of any necessary repairs or remedial actions.

8. Represent Safety-Kleen Corp. in local community affairs and public relation activities.

9. Coordinate with corporate Technical Services and Environment, Health, and Safety Departments and implement necessary actions or plans for regulatory compliance.

10. Be able to act as the primary emergency response coordinator.

SALES REPRESENTATIVE

JOB DESCRIPTION

The Sales Representative is charged with the responsibility of generating new business and servicing established accounts within a certain defined geographic area.

REPORTS TO:

Branch Manager

QUALIFICATION:

Minimum high school graduate

PRINCIPAL RESPONSIBILITIES:

1. Maintain his route truck and replenish his products on the truck before beginning his route sales.

2. Contact potential customers for the purpose of selling Safety-Kleen services and allied products.

3. Exchange used solvents with fresh solvent and replenish the inventory of Safety-Kleen's products for existing customers.

4. Make minor repairs of Safety-Kleen's parts washer equipment or lease new equipment to the customer.

5. Prepare the necessary paper work for each service, and bill or credit the customer, as necessary.

6. At the end of each day, return the truck to the branch for cleaning and maintenance, and summarize the day's activities so the branch manager can tabulate the daily figures and forward them to the corporate office.

BRANCH SECRETARY

JOB DESCRIPTION

Performs duties to assist the branch manager, sales representatives, and customers with billing, scheduling and recordkeeping. Performs secretarial duties at the branch.

REPORTS TO:

Branch Manager

QUALIFICATION:

Attended high school

PRINCIPAL RESPONSIBILITIES:

1. Maintain records in an orderly manner.
2. Assist sales representatives in scheduling services.
3. Insure that all hazardous waste manifests are complete, and manage distribution and filing of copies.
4. Maintain Personnel Training Record files.
5. Maintain Facility Inspection Records.
6. Answer customer inquiries.
7. Manage customer billing.
8. Perform other related duties as assigned.

WAREHOUSEMAN

JOB DESCRIPTION

Performs duties to assist the sales representatives in loading and unloading the trucks. Performs janitorial duties at the warehouse.

REPORTS TO:

Branch Manager

QUALIFICATION:

Attended high school.

PRINCIPAL RESPONSIBILITIES:

1. Maintain warehouse in clean and orderly manner.
2. Assist sales representatives in loading trucks and replacing solvent.
3. Refurbish drums as needed.
4. Park or move trucks as needed.
5. Stock inventory.
6. Replenish trucks with inventory.
7. Perform other related duties as assigned.

RESUME

RICHARD PEOPLES

Position: Environmental Manager, Service Centers
Safety-Kleen Corp.

Education: M.A., Zoology, Indiana University ('69)

B.A., Zoology, Indiana University ('72)

Employment Experience:

Environmental Manager, Service Center
Safety-Kleen Corp.
Elgin, Illinois (1988-Present)

Environmental Scientist, Regional Manager -
Superfund Contract, Black & Veatch Consultants
Kansas City, MO (1987-1988)

Assistant Director of Utilities
City of Bloomington Utilities, Bloomington, Indiana
(1972-1987)

Additional Training:

Branch Facility Manager Trainer (1989)

Certified Hazardous Materials Manager Training - Master Level
(1986)

RESUME

ROBERT WACHSMUTH

Position: Regional Environmental Engineer - Western Region
Safety-Kleen Corp.

Education: B.S. Civil Environmental Engineering,
Michigan Technological University (1976)

Employment Experience:

Environmental Engineer,
Safety-Kleen Corp., January 18, 1982 - Present

Senior Environmental Engineer, Ecology and Environment
June 1, 1980 - January 15, 1982

Project Engineer, Aquatechnics, Inc.
September, 1978 - June, 1980

Project Engineer, RJN Environmental Associates, Inc.
March, 1978 - September, 1978

Designer, Illinois Central Gulf Railroad
November, 1976 - March, 1978

Junior Engineer, Dames & Moore
April, 1976 - November, 1976

Training Experience:

Underground Tank Storage of Hazardous Materials
Sacramento, California in August, 1984

RESUME

JEFFREY E. SIMPSON

Position: Regional Environmental Engineer - West Central
Safety-Kleen Corp.

Education: B.S. Engineering and Public Policy (B.S. EPP)
Washington University, St. Louis, Missouri (May, 1980)

Employment Experience:

Environmental Engineer
Safety-Kleen Corp., May, 1980 - Present

Employed as an Environmental Engineer with responsibility for handling Environmental Affairs in 8 states. Includes training of employees, preparation of contingency plans and regulatory affairs.

Additional Training:

Conducted training of Regional Managers, August, 1986

Hazardous Waste Incineration Today, sponsored by Georgia Institute of Technology, February 13-14, 1986

1984 Hazardous Material Spills Conference, sponsored by Association of American Railroads/Bureau of Explosives, Chemical Manufacturers Association, U.S. Coast Guard, U.S. EPA. April 9-12, 1984

RESUME

PAUL D. PEDERSON

Position: Regional Environmental Engineer - Great Lakes
Safety-Kleen Corp.

Education: Bachelors of Chemical Engineering, University of Minnesota (1983)

Employment Experience:

Regional Environmental Engineer
Safety-Kleen Corp.
(July, 1986 - Present)

Application Engineer
Dale Electronics
(1983 - 1986)

Additional Training:

SARA Emergency Planning Workshop;
Pannell, Kerr, Forster
(October, 1987)

Fundamentals of Groundwater Contamination;
Geraghty and Miller
(March, 1987)

RESUME

IVETTE SANTANA

Position: Regional Environmental Engineer - New York and New Jersey
Safety-Kleen Corp.

Education: M.S. Environmental Science, New Jersey Institute of Technology
(1989-present)

B.S. Biology, College of Saint Elizabeth, Convent Station, NJ
(1985)

Employment Experience:

Regional Environmental Engineer
Safety-Kleen Corp.
(Jan., 1989 - Present)

Compliance Officer
Solvent Recovery Services
(1987 - 1989)

Approvals Manager
Kramer Environmental
(1985 - 1986)

Research Assistant
Method Development-HPLC
Intech Biolabs
(1984 - 1985)

Additional Training:

Right-To-Know Seminar - 1989

Hazmat-Environmental Compliance Seminar - 1986

Professional Supervising - 1986

RESUME

JANE E. MAIER

Position: Regional Environmental Engineer - Northwest
Safety-Kleen Corp.

Education: M.S. Civil Engineering, Univ. of Pennsylvania (1984)

B.S. Civil Engineering, Univ. of Pennsylvania (1983)

Employment Experience:

Regional Environmental Engineer
Safety-Kleen Corp.
(May, 1990 - present)

Environmental Engineer, Regulatory & Permitting Specialist
CH2M Hill, Inc.
(August 1985 - April 1990)

Environmental Engineer - Compliance
U.S. EPA Region VI
(July 1984 - July, 1985)

Additional Training:

RCRA Hazardous Waste Seminar
(April 1988)

Oil Spill Control Course -
Texas A & M University Engineering Extension (1985)

40 Hour Hazardous Waste Training
(March 1985 and yearly refresher)

CPR & First Aid
(April 1985 and refresher, as required)

EIT Pennsylvania
Untangling the Web of Professional Liability
September, 1986

RESUME

JEFFREY A. WILLIS

Position: Regional Environmental Engineer - Mideast Region
Safety-Kleen Corp.

Education: Master of Science, Environmental Science,
Indiana University (1988)

Bachelor of Science, Biology
Northern Michigan University (1985)

Employment Experience:

Regional Environmental Engineer,
Safety-Kleen Corp.
March 1990 - Present

Environmental Scientist/ Project Manager
PEI Associates, Inc.
May 1988 - March 1990

Training Experience:

Region V Federal/State Environmental
Regulations Conference (September 1988

Region IV Technical Systems Audit Course
January 1990

RESUME

THOMAS R. HEATON

Position: Regional Environmental Engineer - New England
Environment, Health and Safety Department - Safety-Kleen Corp.

Education: M.S., Department of Technology & Human Affairs, Sever Institute of Technology, Washington University, St. Louis, MO (1978).

B.S., Zoology & Environmental Affairs, Butler University, Indianapolis, IN (1976).

Employment Experience:

Regional Environmental Engineer
Safety-Kleen Corp.
(1986 - Present)

Senior Environmental Specialist, Borden Inc., Columbus, OH, Nov. (1980 - Sept. 1986)

Environmental Scientist, Ohio Environmental Protection Agency, Nov. (1978 - Nov. 1980)

Additional Training:

Massachusetts Environmental Issues Workshop, Associated Industries of Massachusetts,
Worcester, MA (1989)

Underground Storage Tank Management, Ohio Petroleum Council, Worthington, OH (1986)

Groundwater Contamination Seminar, Center for Energy and Environmental Management (CEEM), Schaumburg, IL (1984)

RESUME

JAY LANAHAN

Position: Regional Environmental Engineer - South Central
Safety-Kleen Corp.

Education: M.S. Industrial Microbiology, Univ. of Houston (1987)

B.S. Marine Biology, Texas A & M Univ. (1981)

Employment Experience:

Regional Environmental Engineer
Safety-Kleen Corp.
(August, 1988 - present)

Mgr. Technical Affairs
Evans Cooperage Company
(May, 1987- July, 1988)

Hazardous Waste Specialist
Texas Water Commission
(April, 1984 - May, 1987)

Additional Training:

Registered Public Health Sanitarian - State of Texas

Oil Spill Control Course -
Texas A & M University Engineering Extension (1985)

safety-kleen

PROTECTING YOU AND THE ENVIRONMENT

Training Record for New Employees

Branch Number __/ ___/ __

Branch Manager _____

New Sales Representative _____ Date Hired _____

Module Title	Initials	Date Seen
1. Accidental Product Releases-Transportation & Customer Related	_____	_____
2. Accidental Product Releases at the Branch	_____	_____
3. Material Safety Data Sheets - Overview	_____	_____
4. Material Safety Data Sheets - Safety & Health Related Information	_____	_____
5. The Manifest	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

Certification by the employee that training has been received obligates the employee to discharge his duties in accordance with the training provided. Failure to comply with the requirements established during the training program may result in civil or criminal penalties against the employee.

White Copy - Branch Files
Yellow Copy - Regional Files
Pink Copy - Sales Training and Development

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Form ST101

safety-kleen

PROTECTING YOU AND THE ENVIRONMENT

Training Record

Module _____ Title _____

Branch Number __/__ __ __/__ __

Branch Manager _____

Sales Representative

Print Name Clearly	Initials	Date Seen

White Copy - Branch Files
Yellow Copy - Regional Files
Pink Copy - Sales Training and Development

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Certification by the employee that training has been received obligates the employee to discharge his duti in accordance with the training provided. Failure to comply with the requirements established during the training program may result in civil or criminal penalties against the employee.

APPENDIX H
FINANCIAL REQUIREMENTS

safety-kleen

Director
New Mexico Environmental Improvement Division
P.O. Box 968
Santa Fe, NM 87504-0968

Dear Sir:

I am the chief financial officer of Safety-Kleen Corp., 777 Big Timber Road, Elgin, Illinois, 60123. This letter is in support of this firm's use of the financial test to demonstrate financial assurance as specified in the New Mexico Hazardous Waste Management Regulations, Part II 206.C.3 and 206.D.3.

1. This firm is the owner or operator of the following facilities for which financial assurance for closure and post-closure care is demonstrated through the financial test specified in New Mexico Hazardous Waste Management Regulations, Part II 206.C.3 and 206.D.3. The current closure and/or post-closure cost estimates covered by the test are shown for each facility: total per attached listing - closure $100,000; post-closure $78,000.

2. This firm guarantees, through the corporate guarantee specified New Mexico Hazardous Waste Management Regulations Part II 206.C.3 and 206.D.3, the closure and post-closure care of the following facilities owned or operated by subsidiaries of this firm. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: closure $689,320; post-closure $0.

3. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care is not demonstrated either to the New Mexico Environmental Improvement Division through the financial test or any other financial assurance mechanism specified in New Mexico Hazardous Waste Management Regulations, Part II 206.C.3 and 206.D.3. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: total per attached listing - closure $6,629,450; post-closure $1,618,700.

This firm is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on the Saturday closest to December 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended December 30, 1989.

(con't)

777 BIG TIMBER ROAD ELGIN, ILLINOIS 60123 PHONE 708/697-8460 FAX 708 697-4295

Alternative I

1.	Sum of current closure and post-closure cost estimates (total of all cost estimates shown in the three paragraphs on the previous page)	$ 9,115,470
*2.	Total liabilities	$277,372,000
*3.	Tangible net worth	$224,858,000
*4.	Net worth	$260,630,000
*5.	Current assets	$139,143,000
*6.	Current liabilities	$ 82,040,000
*7.	Net working capital (line 5 minus line 6)	$ 57,103,000
*8.	The sum of net income plus depreciation, depletion, and amortization	$ 80,040,000
*9.	Total assets in U.S.	$449,400,000

		YES	NO
10.	Is line 3 at least $10 million?	X	
11.	Is line 3 at least 6 times line 1?	X	
12.	Is line 7 at least 6 times line 1?	X	
*13.	Are at least 90% of firm's assets located in the U.S.?		X
14.	Is line 9 at least 6 times line 1?	X	
15.	Is line 2 divided by line 4 less than 2.0?	X	
16.	Is line 8 divided by line 2 greater than 0.1?	X	
17.	Is line 5 divided by line 6 greater than 1.5?	X	

I hereby certify that the wording of this letter is identical to the wording specified in New Mexico Hazardous Waste Management Regulations, Part II 206.D.3.j.(6) as such regulations were constituted on the date shown immediately below.

Robert W. Willmschen
Vice President - Finance

March 10, 1990
RWW/pz

EPA MASTER LIST 3/90

CATEGORY #1 (See Transmittal Letter for Description)

STATE OF CONNECTICUT

Branford ($50,000)	(0)	(2-112-01)	11 Tipping Drive Branford, CT 06405	CTD 980667927
West Hartford ($50,000)	(39,000)	(2-070-01)	24 Brixton Street West Hartford, CT 06110	CTD 000845982

STATE OF IDAHO

Boise ($50,000)	(39,000)	(1-183-08)	514 E. 45th Street Boise, ID 83704	IDD 000712026
Pocatello ($50,000)	(39,000)	(1-183-28)	2610 Garrettway Pocatello, ID 83201	IDD 991281270
Boise ($50,000)	(0)	(1-183-01)	Supply Way and Gowan Road Boise, ID 83705	IDD 981770498

STATE OF IOWA

Davenport ($50,000)	(0)	(5-047-01)	3035 West 73rd Street Davenport, IA 52806	IAD 098027592
Grimes ($50,000)	(39,000)	(5-053-01)	5318 NW 111 Drive, RR #2 Grimes, IA 50111	IAD 083489773
Des Moines ($50,000)	(0)	(5-053-01)	4705 NE 22nd Street Des Moines, IA 50317	IAD 981718000
Mason City ($ 50,000)	(39,000)	(5-093-01)	16 SW 11th Street Mason City, IA 50401	IAD 000678326
$450,000	195,000			
Closure	Post Closure			

CATEGORY #2 (See Transmittal Letter for Description)

Safety-Kleen Envirosystems Company of Puerto Rico, Inc. - Manati ($318,220)	(0)		KM 51, Hwy. 2 (P.O. Box 1098) Manati, PR 00701	PRD 090399718

Safety-Kleen Envirosystems of Puerto Rico, Inc. - Dorado ($84,275)	(0)	KM 267, Hwy. 2 Dorado, PR 00646	PRD 981182421
Breslube USA ($286,825) $689,320	 (0) (0)	601 Riley Road E. Chicago, IN 46312	IND 077042034

Closure Post Closure

CATEGORY #3

STATE OF ALABAMA

Dolomite ($50,000)	(3-019-01) (0)	1002 Hoke Avenue Dolomite, AL 35061	ALD 077640001
Gurley ($50,000)	(3-019-02) (39,000)	201 Section Line Street Gurley, AL 35748	ALD 000776807
Huntsville ($165,000)	(0-007-49) (0)	Colemont Ind. Site U.S. 72 East Huntsville, AL	ALD 981028798
Montgomery ($50,000)	(3-019-21) (0)	4815 N. Birmingham Montgomery, AL 36308	ALT 020010997
Whistler $50,000)	(6-133-01) (0)	3023 Dials Street Whistler, AL 36612	ALD 071951628

STATE OF ARIZONA

Phoenix ($50,000)	(7-142-01) (39,000)	4401 E. University Phoenix, AZ 85034	AZD 089308803
Tucson ($50,000)	(7-142-02) (0)	4161 E. Tennessee Tucson, AZ 85714	AZD 980892897
Chandler ($50,000)	(7-142-01) (0)	Lot 42, Beck Avenue Williams Field Rd. Ind. Park Chandler, AZ 05224	AZD 981969504

STATE OF ARKANSAS

Little Rock ($50,000)	(6-086-01) (39,000)	11727 Arch St. Pike Little Rock, AR 72206	ARD 054575238
Fort Smith ($50,000)	(6-063-01) (39,000)	2511 Johnson Street Fort Smith, AR 72904	ARD 000709733
West Memphis ($50,000)	(6-094-01) (0)	309 Mound City Road Between I 55 and 40 West Memphis, AR 72301	ARD 056855232

STATE OF COLORADO

Commerce City (\$50,000)	(0)	(6-052-01)	4980 Locust Street Commerce City, CO 80022	COD 000716613
Englewood AC (\$165,000)	(0)	(6-052-02)	2801 S. Tejon Englewood, CO 80110	COD 000716621
Grand Junction (\$50,000)	(0)	(6-052-21)	368 Bonny Grand Junction, CO 81501	COT 090010851
Pueblo (\$50,000)	(0)	(6-052-04)	2841 East Fourth Street Pueblo, CO 81001	COD 000716639
Denver (\$100,000)	(0)		1345 Bayoud Avenue Denver, CO 80223	COD 980954101

STATE OF FLORIDA

Casselberry (\$50,000)	(0)	(3-130-01)	464 A Pulmosa Drive Casselberry, FL 32707	FLD 097837983
Delray Beach (\$50,000)	(0)	(3-097-01)	16086 SW 4th Ave., Bldg. B Delray Beach, FL 33444	FLD 000776757
Boynton Beach (\$50,000)	(0)	(3-097-01)	Lot 46B Boynton Beach Park of Commerce Boynton Beach, FL	Applied For
Orange Park (\$50,000)	(0)	(3-079-01)	161 Industrual Loop South Orange Park, FL 32073	FLD 980847214
Miami (\$50,000)	(0)	(3-097-02)	7875 NW 54th Street Miami, FL 33166	FLD 980840086
Miami (\$50,000)	(0)	(3-097-02)	Palmetto Dr. & NW South River Dr. Medley, FL	Applied For
Port Charlotte (\$50,000)	(0)	(3-163-02)	19200 Peachland Blvd. Bachman Blvd. Port Charlotte, FL 33949	FLD 000776716
Tallahassee (\$50,000)	(39,000)	(3-079-02)	3082 West Tharpe Street (Rear) Tallahassee, FL 32303	FLD 000776773
Tallahassee (\$50,000)	(0)		Entrepot Blvd.-Airport Ind. Park Tallahassee, FL 32303	Applied For
Tampa (223,200)	(0)	(3-163-01)	4701 North Manhattan Tampa, FL 33614	FLD 049557408
Tampa AC (\$165,000)	(0)	(0-007-50)	5309 24th Avenue South Tampa, FL 33619	FLD 980847271

STATE OF INDIANA

Evansville ($50,000)	(0)	(5-060-01)	4417 St. Joe Street Evansville, IN 47712	IND 000815894
Fort Wayne ($150,000)	(0)	(5-068-01)	2112 Production Road Ft. Wayne, IN 46808	IND 000715466
Indianapolis-E ($50,000)	(39,000)	(4-076-02)	8418-26 Brookville Road Indianapolis, IN 46239	IND 000815886
Portage ($50,000)	(39,000)	(5-034-06)	6050 Eagle Drive Portage, IN 46368	IND 000714428
South Bend ($50,000)	(39,000)	(5-082-01)	2217 Western Avenue South Bend, IN 46628	IND 000715474

STATE OF KANSAS

Kansas City ($50,000)	(0)	(5-085-01)	11565 K-32 Highway Kansas City, KS 66111	KSD 000687681
Dodge City ($50,000)	(0)	(6-195-21)	600 East Trail Dodge City, KS 67801	KSD 980686844
Wichita ($50,000)	(39,000)	(6-195-01)	1311 South Anna Wichita, KS 67209	KSD 000809723
Edwardsville ($50,000)	(39,000)	(5-085-01)	9317 Woodend Road Edwardsville, KS 66022	KSD 980973515
Bonner Springs ($ 0)	(409,700)	(5-085-01)	11565 K 32 Highway Bonner Springs, KS	KSD 000687681

STATE OF LOUISIANA

Pineville ($50,000)	(0)	(6-073-04)	4200 Shreveport Highway Pineville, LA 71360	LAD 000757708
Tioga AC ($165,000)	(0)	(6-073-04)	518 Ryder Drive Pineville, LA 71360	LAD 981057441
Kenner ($50,000)	(39,000)	(6-115-01)	14 26th Street Kenner, LA 70062	LAD 089841902

STATE OF MAINE

Leeds ($50,000)	(0)	(2-011-01)	Route 202, RFD 3, Box 1990 Leeds, ME 04263	MED 980667810

STATE OF MARYLAND

Baltimore $50,000)	(0)	(2-016-01)	1448 Desoto Road Baltimore, MD 21230	MDD 981034291
Glen Burnie ($50,000)	(39,000)	(2-016-02)	150 Penrod Court Section G & H Glen Burnie, MD 21061	MDD 000737106
Silver Springs ($50,000)	(39,000)	(2-058-01)	12164 Tech Road Silver Springs, MD 20904-1980	MDD 000737395

STATE OF MINNESOTA

Cloquet ($50,000)	(0)	(5-050-01)	1302 18th Street Cloquet, MN 55720	MND 000686170
St. Paul ($50,000)	(0)	(5-103-01)	180 Ryan Drive St. Paul, MN 55117	MND 000823823
Blaine ($50,000)	(0)	(5-103-01)	Lot 1 and Hokanson Ind. Park Isanti St. NE Blaine, MN 55434	MND 981953045
Eagan AC ($165,000)	(39,000)	(5-103-02)	3227 Terminal Drive Eagan, MN 55121	MND 981097884

STATE OF MISSISSIPPI

Jackson ($50,000)	(0)	(6-078-01)	120 Richardson Drive Jackson, MS 39209	MSD 000776765
Southhaven AC ($165,000)	(0)	(0-007-44)	7217 Airways Avenue Southhaven, MS 38671	MSD 981030894

STATE OF MISSOURI

Blue Springs ($50,000)	(0)	(5-085-02)	24016 East 40 Highway Blue Springs, MO 64015	MOD 000669077
Cape Girardeau ($50,000)	(0)	(5-030-01)	Route 2, Box 549-D Cape Girardeau, MO 63701	MOD 000669051
Columbia ($50,000)	(0)	(5-042-01)	610 Big Bear Blvd. Columbia, MO 65201	MOD 980971626
St. Charles ($50,000)	(0)	(5-160-03)	4526 Towne Court, Lot #22 Harvestowne Industrial Park St. Charles, MO 63301	MOD 095486312
Springfield ($50,000)	(0)	(6-193-02)	734 Northwest Bypass 66 Springfield, MO 65802	MOD 000669069

Independence AC ($165,000)	(0)	(5-085-02)	901 Yuma Independence, MO 64056	MOD 980973564
ıfety-Kleen Envirosystems Inc. - Clarksville, MO ($196,250)	(0)		Hwy. 79 North P.O. Box 456 Clarksville, MO 63336	MOD 029729688

STATE OF NEBRASKA

Gering ($50,000)	(0)	(6-052-03)	RR 1, Box 15E Gering, NE 69341	NED 000687178
Grand Island ($50,000)	(39,000)	(5-065-01)	Highway 281 South Behind Grand Island Dodge Grand Island, NE 68801	NED 000687186
Grand Island ($50,000)	(0)	(5-065-01)	2700 W. 2nd Avenue Grand Island, NE 68801	NED
Omaha ($50,000)	(0)	(5-127-01)	14564 Grover Street Omaha, NE 68144	NED 020185138
Omaha AC ($175,000)	(0)	(5-127-01)	Lamont & 139th St. Omaha, NE 68144	NED 981495724

STATE OF NEVADA

North Las Vegas ($50,000)	(0)	(7-087-01)	1655 Stocker Street North Las Vegas, NV 89030	NVD 007096761

STATE OF NEW MEXICO

Albuquerque ($50,000)	(39,000)	(7-008-01)	2720 Girard NE Albuquerque, NM 87107	NMD 000804294
Farmington ($50,000)	(39,000)	(7-008-21)	4200A Hawkins Road Farmington, NM 87401	NMD 980698849

STATE OF NORTH CAROLINA

Charlotte ($50,000)	(0)	(3-031-01)	2320 Yadkin Avenue Charlotte, NC 28205	NCD 079060059
Raleigh ($50,000)	(0)	(3-171-01)	Sommerville Industrial Building Route 3, 6225 Old State Road Raleigh, NC 27603	NCD 000776740
High Point AC ($165,000)	(0)	(3-064-01)	High Point Building, Inc. Mendenhall Road High Point, NC 27263	NCD 077840148
St. Pauls ($50,000)	(0)	(3-031-02)	Hwy. 301 North St. Pauls, NC 28384	NCD 980846935

STATE OF NORTH DAKOTA

Fargo $50,000)	(0)	(1-183-03)	1537-1/2 First Avenue South Fargo, ND 58103	NDD 000716738
Bismarck ($50,000)	(0)	(1-183-23)	3704 Saratoga Bismarck, ND 58501	NDD 980957070

STATE OF OKLAHOMA

Wheatland ($50,000)	(0)	(6-124-01)	7825 State Hwy. 152 Wheatland, OK 73097-0128	OKD 980878474
Tulsa ($50,000)	(39,000)	(6-193-01)	16215 East Marshall Street Tulsa, OK 74138	OKD 000763821

STATE OF OREGON

Springfield ($50,000)	(39,000)	(7-054-01)	550 Shelley Street Space C & D Springfield, OR 97477	ORD 000712067
Clackamas ($50,000)	(39,000)	(7-148-01)	11843 SE Highway 212 Clackamas, OR 97015	ORD 092895481
Clackamas AC ($165,000)	(0)	(7-148-01)	16540 SE 130th Street Clackamas, OR 97015	ORD 981766124

STATE OF SOUTH DAKOTA

Sioux Falls ($50,000)	(39,000)	(1-183-05)	2000 North Westport Avenue Sioux Falls, SD 57107	SDD 000716696

STATE OF TENNESSEE

Dyersburg ($50,000)	(0)	(6-051-01)	2010 Brewer Road Dyersburg, TN 38024	TND 981027410
Knoxville ($50,000)	(39,000)	(3-080-01)	826 Stewart Knoxville, TN 37917	TND 079025698
Nashville ($50,000)	(39,000)	(3-109-01)	215 Whitsett Road Nashville, TN 37210	TND 981474125

STATE OF UTAH

Salt Lake City ($50,000)	(0)	(7-166-01)	394 Ironwood Drive Salt Lake City, UT 84115	UTD 052430741
Salt Lake City ($50,000)	(0)	(7-166-01)	1066 Pioneer Road Salt Lake City, UT 84104	UTD 980957088

STATE OF VERMONT

Barre ($50,000)	(0)	(2-105-01)	23 West Second Street Barre, VT 05641	VTD 000791699

STATE OF VIRGINIA

Bristol ($50,000)	(0)	(3-026-01)	2146 King Mill Road Bristol, VA 24201	VAD 981042955
Chesapeake ($50,000)	(0)	(3-121-01)	4545 Bainbridge Blvd. Chesapeake, VA 23320	VAD 000737346
Chester ($50,000)	(0)	(3-154-01)	1200 West 100 Road Chester, VA 23831	VAD 981043011
Vinton ($50,000)	(0)	(3-155-01)	Route 24 East of Vinton at O'Neal Drive Vinton, VA 24179	VAD 000737361

STATE OF WASHINGTON

Auburn ($50,000)	(39,000)	(1-181-01)	3210 C Street NE, Unit G Auburn, WA 98002	WAD 000712059
Lynwood ($50,000)	(39,000)	(7-092-01)	6303 212th Street SW, Suite C Lynwood, WA 98036	WAD 000712042
Pasco ($50,000)	(0)	(1-183-02)	814 E. Ainsworth Pasco, WA 99301	WAD 980978746
Spokane ($50,000)	(39,000)	(1-183-01)	9516 East Montgomery, Unit 16 Spokane, WA 99206	WAD 000712034

STATE OF WEST VIRGINIA

Nitro ($50,000)	(39,000)	(4-075-02)	Rock Branch Industrial Park Nitro, WV 25143	WVD 000737387
Fairmont ($50,000)	(39,000)	(4-145-23)	345 Locust Fairmont, WV 26554	WVD 980510895
Wheeling ($50,000)	(0)	(4-145-03)	10 Industrial Park Dr. Wheeling, WV 26003	WVD 981034101
$6,279,450	$1,501,700		Waukesha, WI 53186	
Closure	Post Closure			

HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE

1. National Union Fire Insurance Company (the "Insurer") of Pittsburgh, PA hereby certifies that it has issued liability insurance covering bodily injury and property damage to Safety-Kleen Corp., (the "Insured"), of 777 Big Timber Road, Elgin, Illinois 60123 in connection with the Insured's obligation to demonstrate financial responsibility under New Mexico Hazardous Waste Management Regulations, Part II, 206.C.3.h or 206.D.3.h. The coverage applies at:

   (SEE ATTACHED LIST) (NEW MEXICO)

   for sudden accidental occurrences. The amounts of liability are $2 million per each occurrence with annual aggregate of $2 million, exclusive of legal defense costs. The coverage is provided under policy number RMGL2498750 issued on October 1, 1990. The effective date of said policy is October 1, 1990.

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

   (a) Bankruptcy or insolvency of the Insured shall not relieve the Insurer of its obligations under the policy.

   (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the Insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in the New Mexico Hazardous Waste Management Regulations, Part II, 206.C.3h. (6).

   (c) Whenever requested by the New Mexico Environmental Improvement Division (EID), the Insurer agrees to furnish to the Director a signed duplicate original of the policy and all endorsements.

   (d) Cancellation of the insurance, whether by the Insurer or the Insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the EID Director.

   (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the EID Director.

I hereby certify that the wording of this instrument is identical to the wording specified in the New Mexico Hazardous Waste Management Regulations, Part II, 206.D.3.j. (10) as such regulations were constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines Insurer, in one or more states, and is authorized to conduct insurance business in one or more states.

Bernard M. Dunne

Bernard M. Dunne
Authorized Representative
National Union Fire Insurance Company
500 West Madison
Chicago, IL 60606

Issue Date: 9/27/90

STATE OF NEW MEXICO

Albuquerque	(7-008-01)	2720 Girard NE Albuquerque, NM 87107	NMD000804294
Farmington	(7-008-21)	4200A Hawkins Rd. Farmington, NM 87401	NMD980698849

ALBUQUERQUE, NEW MEXICO FACILITY
CLOSURE COST ESTIMATE

1. Tank Closure - Open, remove contents of, clean, remove, and dispose of a 12,000-gallon underground storage tank.

Phase I - Remove Contents and Clean

1. Ship contents to a reclaimer.

Crew:	
2 Truck Dr. $17.56/hr. x 8 hrs. =	$ 281.28
2 Trucks $500 lump sum	500.00
Tank size = 12,000 gal. - 7,500 gal/truck = 2 trucks	
2 trucks x 300 miles x 1.75/mile =	1,050.00
Reclamation costs ($0.30/gal.)	3,600.00

2. Squeegie Clean Tank

Crew:	
1 Foreman $18.30/hr. x 24 hrs. =	439.20
1 Laborer ($17.00/hr. & $3.00/hr. hazard pay) x 24 hrs. =	480.00

3. Use of high pressure water for two days	800.00
4. Disposal and transportation of Wash Water (1,200 gallons @ $0.70/gallon) =	840.00
5. Transportation of wastewater 300 miles x $1.75/mile =	525.00
6. Test final rinsate (2 samples)	2,000.00
Total - Phase I	$10,515.00

Phase II - Remove and Dispose of Tank

1. Disconnect and Remove Appurtenant Equipment

Crew:	
1 Foreman $18.30/hr. x 8 hrs. =	$ 146.40
2 Laborers $17.00/hr. x 8 hrs. =	272.00

2. Torch Tank

Crew:	
1 Foreman $18.30/hr. x 8 hrs. =	146.40
1 Laborer $17.00/hr. x 8 hrs.	136.00

3. **Remove Tank**

Crew:		
1 Foreman	$18.30/hr. x 2 hrs. =	36.60
4 Laborers	$16.80/hr. x 2 hrs. =	134.40
1 Backhoe	$28.97/hr. x 2 hrs. =	57.94
Equipment	$200 Lump Sum =	200.00
	Total Phase II =	$1,130.00

Phase III - Concrete Demolition

1. Demolition of concrete pad	$ 750.00
2. Removal and disposal of concrete 200 cyd at $4.50/cyd	900.00
	$1,650.00

Phase IV - Backfilling, Regrading, Soil Testing

1. Test for soil contamination 4 samples	$4,000.00

2. Regarding

Crew:		
1 F.E. Loader	$27.38/hr. x 1 hr. =	27.38
Equipment	$200.00 lump sum =	200.00
Backfill	10 c.y. x $2.00 c.y. =	20.00
	Total - Phase IV =	$1,247.00

Summary of Closure Cost for 12,000-gallon tank:

Phase I =	$10,515.00
Phase II =	1,130.00
Phase III =	1,650.00
Phase IV =	4,247.00
	$17,542.00

2. <u>CLOSURE OF DRUM STORAGE AREA</u> - Remove and return drums to a reclaimer, clean the drum storage areas, and dispose of wash water generated.

a. 2 Truck Dr. $17.56/hr. x 8 hrs.	$ 280.96
2 Trucks - $ 500 lump sum	500.00
Hauling cost = 2 loads x 300 miles x $1.75/mile =	1,050.00

b. Clean drum storage areas

Crew:	
1 Foreman $18.30/hr. x 10 hrs. =	183.00
1 Laborer ($17.00/hr. & $3.00/hr. hazard pay) x 20 hrs. =	200.00
c. Dispose of wash water 700 gallons x $0.12/gallon =	84.00
d. Dispose of used solvents - 378 16-gallon drums x $30/drum =	11,340.00
e. Testing rinsate for contamination 2 samples x $1,000.00 each	2,000.00
	$15,638.00

3. CLOSURE OF RETURN AND FILL STATION - Remove, package and dispose of sediment, clean the dumpster and dock area, remove dumpster and dock structure for reuse or scrap.

a. 1 Truck @ $250 lump sum each	$ 250.00
Hauling Cost = 300 miles x $1.75/mile	525.00
1 Truck Dr. $17.56/hr. x 8 hrs.	140.48
Crew:	
1 Foreman $18.30/hr. x 8 hrs. =	146.40
1 Laborer (17.00/hr. & $3.00/hr. hazard pay) x 8 hrs. =	160.00
b. Clean Dumpster and Dock Areas	
Crew:	
1 Foreman $18.30/hr. x 8 hrs. =	146.40
1 Laborer ($17.00/hr. & $3.00/hr. hazard pay) x 8 hrs. =	160.00
Use of high pressure water for one day =	400.00
c. Disposal of wash water 200 gallons x $0.70/gallon =	140.00
d. Dispose of dumpster mud 15 55-gallon drums x $300/drum =	4,500.00
e. Test rinsate for contamination 2 samples x $1000 each	2,000.00

f. Disassemble, and remove dumpsters and docks -
Crew:

1 Foreman $18.30/hr. x 8 hrs. -	146.40
2 Laborers $17.00/hr. x 8 hrs. -	272.00
Equipment $ 5.20/hr. x 8 hrs. -	41.60
Total Dock Closure Cost -	$9,028.00

4. PE CERTIFICATION - $1,000.00

5. TOTAL CLOSURE COST:

12,000-gallon tank -	$17,542.00
Drum storage area -	15,638.00
Return and fill station and paint waste shelter -	9,028.00
P.E. certification -	1,000.00
Total	$43,208.00