



FEDERAL EXPRESS

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Dr. A. Elizabeth Gordon, PhD.  
Permitting Section, Hazardous and  
Radioactive Waste Bureau  
New Mexico Health and Environment Department  
1190 St. Francis Drive  
Santa Fe, New Mexico 87503

Subject: Albuquerque Service Center  
Draft Part B Permit

Dear Dr. Gordon,

This has been prepared as a commentary on the subject draft document. With reference to the cited sections of the draft permit, the following comments are offered:

I.1.1 - The annual quantities listed in the Part A application are the most up to date and accurate. They were calculated using two factors: the amount of waste generated the previous year and an assumed 50% growth factor over the life of the permit. You should note that the amounts listed in the subsections following the introductory paragraph of section I.1.1 are the volumes generated during 1989. Therefore, the Abstract has been revised to reflect the volumes used in the Part A permit application and Safety-Kleen believes the wording of section I.1.1.a should be reworded to be ". . . exceeds the amount listed in the Abstract and in the Part A . . .". This wording will ensure the facility's being able to manage greater volumes of waste as the business grows.

1.1.2 - The Denton Recycle Center performs analyses in accordance with the waste analysis plan in its Part B permit and Safety-Kleen believes there may conflicts between the plan specified in the draft permit for the Albuquerque site and that authorized by the Texas Water Commission. You should note that each waste stream accepted by the service centers is recharacterized (i.e., a detailed analysis is performed to insure the

wastes' consistency) on an annual basis by a Safety-Kleen or contract laboratory. Therefore, Safety-Kleen believes the language on pages 5 and 6 should be changed to indicate that: 1) the service center will maintain on file the recycle center's analytical results for shipments of waste, and 2) the analytical results of the annual recharacterization will be kept on file. Safety-Kleen does not believe specific information on the analyses to be performed at the recycle center should be included.

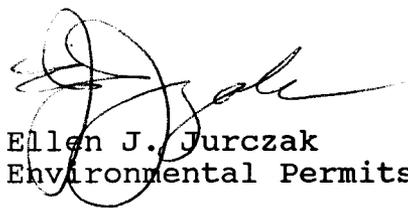
I.1.2.1 - On page 9, the statement is made that Safety-Kleen does not believe the new immersion cleaner is a hazardous waste when in fact it is a TCLP waste (it was not hazardous waste prior to the TCLP regulations coming into effect). Therefore, the second sentence of section II on this page should be reworded to indicate the new immersion cleaner became a hazardous waste when the TCLP regulations came into effect.

II.1.2.1 - The return and fill station is described as a sheet-steel structure when it should be described as having a cinder block outer structure. The building will be cinder block instead of Safety-Kleen's standard sheet steel building to conform to the local fire code.

Attachment II-4 - The first three training records ("Protecting You and the Environment: Training Record for New Employees", "Protecting You and the Environment: Training Record" and "Record of Personnel Training") are obsolete and should be deleted.

Thank you for your consideration of these comments. Safety-Kleen does not believe the suggested comments will necessitate a major modification of the draft permit and can be included in the final permit. Please contact me on extension 2246 if you have any questions or require additional information.

Sincerely,



Ellen J. Jurczak  
Environmental Permits Manager

cc: W. Johnson, Denver Reg. Mgr. J. Jendras W. Olson  
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