



New Mexico Health and Environment Department

OCCUPATIONAL HEALTH AND SAFETY BUREAU
(505) 827-2872

Bruce King
Governor

DENNIS BOYD
Secretary

MICHAEL J. BURKHART
Deputy Secretary

RICHARD MITZELFELT
Director

M E M O R A N D U M

February 19, 1991

To: A. Elizabeth Gordon, PhD, Permit Supervisor
Hazardous and Radioactive Waste Bureau

From: Charles E. Steele, Compliance Manager
Occupational Health and Safety Bureau

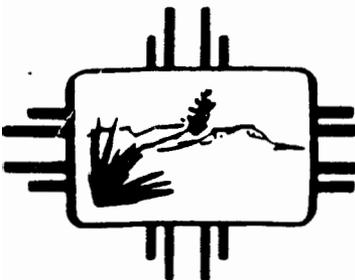
Re: Safety Kleen Corporation
Permit for Hazardous Waste Storage Units



James Ajuziem, an Environmental Specialist with the OHS Bureau has reviewed the documents submitted by Safety Kleen Corporation to determine whether the Division's interest in protecting the health and safety of the facilities' employees has been addressed. Attached is a copy of Mr. Ajuziem's report on his findings.

Although I recognize that the permitting process may not require these issues be addressed in the application, it may be appropriate that the employer provide assurance that the operation will adhere to all regulations and standards enforced by the Division.

I will be glad to answer any questions you may have on this matter.



Governor

DENNIS BOYD
Secretary

MICHAEL J. BURKHART
Deputy Secretary

RICHARD MITZELFELT
Director

OCCUPATIONAL HEALTH AND SAFETY BUREAU
505/827-2872

January 22, 1991

MEMORANDUM

TO: Charles E. Steele, Program Manager
EID/Occupational Health and Safety Bureau

FROM: James O. Ajuziem, Environmental Specialist
EID/Occupational Health and Safety Bureau *JOA 1/22/91*

SUBJECT: Safety-Kleen Corporation - Hazardous Storage Units at
Farmington and Albuquerque

I have reviewed the waste analysis plan submitted by the Safety-Kleen Corporation for the Farmington, New Mexico site. It is my understanding the company is also requesting a permit for a second facility at Albuquerque. At this time, the waste analysis plan for the Albuquerque facility is unavailable for review. The recommendations of this memorandum are based on the Safety-Kleen plan of operation for the Farmington facility. I was told by the EID/Hazardous Waste Bureau that both the Albuquerque and Farmington waste storage units will handle the same chemical wastes.

The Safety-Kleen Corporation collects spent chemicals from New Mexico commercial establishments. Route employees visit the establishments, pour the spent chemicals into secondary containers and transport the waste to any of the two repositories. The waste is held until there is enough material to be transported to a recycling plant for reclamation. The following are some of the chemicals to be handled:

1. Perchloroethylene
2. Methylene chloride
3. Cresylic acid
4. Paint and paint thinners
5. Mineral spirit solvents
6. Chlorinated Solvents.

Some of the chemicals being collected are toxic to the skin, respiratory system and central nervous system. The employees of Safety-Kleen Corporation are required to manually pour the spent chemicals into secondary containers, clean spills and fight fire should the chemicals ignite. There is reasonable possibility for employee exposure to the chemicals through direct contact or vapor.

Although the company has submitted a detailed waste analysis plan, it does not sufficiently address employee safety and health protection in the following areas:

1. Respiratory protection program - 1910.134
2. Fire Protection - 1910.156
3. Hazard Communication Program - 1910.1200(e)
4. Hazardous Waste Operation and Emergency Response Program - 1910.120

Respiratory Protection Program:

The spent chemicals will produce vapor that can be inhaled while being transferred from one container to another. Potentially hazardous atmospheres will again be present during confined space entry to clean the tanks, spills, fire and storage of the chemicals at the company warehouse. These conditions require the Safety-Kleen Corporation to develop a written operating procedure for the safe use of respirators.

The waste analysis plan submitted by the company acknowledges the need for a respirator (pages F-7 and F-9) but failed to specify what employees need the equipment and how the program will be administered.

Fire Protection:

The contingency plan (pages F-5 and F-9) seems to imply that company personnel may fight fire until it spreads beyond their control. A written fire safety policy which establishes a fire brigade and its function at the work place is necessary. An alternative will be to implement a total evacuation of employees from the workplace during a fire.

Hazard Communication Program:

There was no mention of a hazard Communication Program in the waste analysis plan submitted by the company. The Hazard Communication Standard is necessary to inform the employees of the chemicals they may be exposed to, and the protective measures that are available.

Hazardous Waste Operation and Emergency Response Program:

The company handles hazardous waste chemicals and there is possibility for employee exposure to the waste. The company should fully comply with the

Charles E. Steele
January 22, 1991
Page 3

requirements of CFR 1910.120. Although the company waste analysis plan currently incorporates some requirements of the hazardous waste operation and emergency response program, it did not include a written safety and health program for the employees. Specifically lacking were:

1. Medical surveillance program
2. Safety and health training program
3. Air monitoring program
4. Personal protective equipment to be used by employees for each task and operation being conducted.

It is my opinion that the present waste analysis plan was written to satisfy the permit conditions of the Hazardous Waste Bureau. It does not address in any detail employee health and safety. The company should be encouraged to comply fully with CFR 1910.120, and provide a safety handbook for its employees that explains how each task is to be performed.