



FEDERAL EXPRESS

July 11, 1991

Ms. Kathleen M. Sisneros, Bureau Chief
Hazardous and Radioactive Waste Bureau
New Mexico Health and Environment Dept.
1190 St. Francis Drive
Santa Fe, New Mexico 87503

Subject: Albuquerque Service Center
Draft Part B Permit

Dear Ms. Sisneros,

This has been prepared as a commentary on the draft permit for the subject facility. With respect to the various sections of the permit, the following comments are offered:

Attachment I-1 - The new immersion cleaner formula should be added to the list on page 1 so it corresponds to the information on page 3 of the same section. A revised page is enclosed for your reference.

Same section, page 5 - The last full paragraph should be reworded to indicate that the analytical results for each load will be kept on file at the branch and that results from the annual recharacterization (which is done by a contract laboratory) will also be kept on file at the service center. The recycle center performs the primary and secondary types of analyses but the TCLP analyses are performed much less frequently (once every five years). Table D-4 has been revised to reflect this. In addition, the primary and secondary tests listed for each waste stream should be revised to correspond to Tables D-1 through D-4.

Please note that some of the decisions concerning the frequencies of analyses were finalized very recently on a corporate-wide basis.

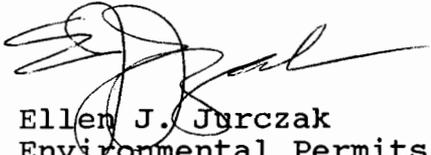
I.1.3 - This section should be reworded to match that of section 2.3 in the attachment.

II.1, p.3 and IV, p. 1 - There are two of each of these pages; the first of the two is correct.

IV. J. - Safety-Kleen does not believe it will be possible to meet the deadlines specified in this section. We do not believe the City will approve the construction permit before September 22, 1991 and that it will not be possible to complete construction and certify the "as-built" drawings before the end of February in 1992. This schedule is optimistic because the City of Albuquerque has voiced objections to previous plans and addressing these objections has caused delays in the past. Therefore, an extension to the deadline in the draft permit is requested.

Thank you for your consideration of these comments. If you have any questions, please contact Jennifer Jendras (x2227) or me (x2246).

Sincerely,



Ellen J. Jurczak
Environmental Permits Manager

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